

# TSD File Inventory Index

Date: December 4, 2006

Initial: C.M. Knecko

Facility Name: <u>Rollprint Packaging Products, Inc.</u>		
Facility Identification Number: <u>LD-984,766,642</u>		
<b>A.1 General Correspondence</b> <u>A.1.3-A.1.5</u>	1	<b>B.2 Permit Docket (B.1.2)</b>
<b>A.2 Part A / Interim Status</b> <u>A.2</u>	1	<b>.1 Correspondence</b>
<b>.1 Correspondence</b>	Y	<b>.2 All Other Permitting Documents (Not Part of the ARA)</b>
<b>.2 Notification and Acknowledgment</b>	Y	<b>C.1 Compliance - (Inspection Reports)</b>
<b>.3 Part A Application and Amendments</b>	Y	<b>C.2 Compliance/Enforcement</b> <u>C.2</u>
<b>.4 Financial Insurance (Sudden, Non Sudden)</b>	X	<b>.1 Land Disposal Restriction Notifications</b>
<b>.5 Change Under Interim Status Requests</b>		<b>.2 Import/Export Notifications</b>
<b>.6 Annual and Biennial Reports</b>		<b>C.3 FOIA Exemptions - Non-Releasable Documents</b> <u>C.3</u>
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>
<b>.1 Correspondence</b>		<b>.1 RFA Correspondence</b>
<b>.2 Reports</b>		<b>.2 Background Reports, Supporting Docs and Studies</b> <u>D.1.2</u>
<b>A.4 Closure/Post Closure</b>		<b>.3 State Prelim. Investigation Memos</b>
<b>.1 Correspondence</b>		<b>.4 RFA Reports</b>
<b>.2 Closure/Post Closure Plans, Certificates, etc</b>		<b>D. 2 Corrective Action/Facility Investigation</b>
<b>A.5 Ambient Air Monitoring</b>		<b>.1 RFI Correspondence</b>
<b>.1 Correspondence</b>		<b>.2 RFI Workplan</b>
<b>.2 Reports</b>		<b>.3 RFI Program Reports and Oversight</b>
<b>B.1 Administrative Record</b>		<b>.4 RFI Draft /Final Report</b>

Total - 4

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3006(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.  
Comments: \_\_\_\_\_



**LAND AND CHEMICALS DIVISION**Type of Document: Inspection Report/NO4RTCName of Document: Rollprint Packaging Products

	<b>NAMES</b>	<b>DATE</b>
AUTHOR:	<u>Sheila Burrus</u>	<u>2-20-14</u>
APA:	<u><i>[Signature]</i> DC</u>	<u>2/25/14</u>
SECTION CHIEF:	<u><i>[Signature]</i></u>	<u>2-24-14</u>
BRANCH CHIEF:	<u><i>[Signature]</i></u>	<u>2/27/14</u>
DIVISION APA:	<u><i>[Signature]</i> Le Aridge KA</u>	<u>2/28/14</u>
DIVISION DIRECTOR:	_____	_____
OTHERS:	_____	_____

DRA:	_____	_____
RA:	_____	_____

-----

RETURN TO:	_____
PHONE:	_____

COMMENTS:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590  
FEB 28 2014

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL # 7009 1680 0000 7679 6545**  
**RETURN RECEIPT REQUESTED**

Mr. Mark Pederson  
Environmental Health and Safety Manager  
Rollprint Packaging Products, Inc.  
320 S. Stewart Avenue  
Addison, Illinois 60101

Re: Notice of Violation/Return to Compliance  
Rollprint Packaging Products, Inc.  
EPA ID No.: ID 984 766 642

Dear Mr. Pederson:

On January 13, 2014, a representative of the U.S. Environmental Protection Agency inspected the Rollprint Packaging Products, Inc. (Rollprint) facility, located in Addison, Illinois. The purpose of that inspection was to evaluate Rollprint's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.

Based on information provided by Rollprint personnel, a review of records and the inspector's personal observations while inspecting the facility, EPA has determined that Rollprint is engaged in the storage of hazardous waste without a hazardous waste permit, and is in violation of certain requirements of the Illinois Administrative Code (IAC) and the U.S. Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage permit, Rollprint, as a large quantity generator must be in compliance with the conditions of 35 IAC § 722.134 (a) and (c) [40 CFR § 262.34 (a) and (c)]. We find that Rollprint was not in compliance with the following conditions and requirements of RCRA and, therefore, was not exempt from having a hazardous waste storage permit:





1. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must maintain job titles for each position at the facility related to hazardous waste management, the name of the employee filling each job, a written job description for each position, a written description of the type and amount of both introductory and continuing training that will be given to each person, and records that document that the training and job experience required has been given to, and completed by, facility personnel. See IAC §§ 722.134(a)(4) and 725.116(d) [40 CFR §§ 262.34(a)(4) and 265.16(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under 35 IAC §§ 724.116(d) and 725.116(d) [40 CFR §§ 264.16(d)] and 265.16(d)].

At the time of the inspection, Rollprint had not maintained a written description of the type and amount of both introductory and continuing training that will be given to each person, and records that documented that the training and job experience required have been given to, and completed by employees that handle and/or manage hazardous waste. Rollprint, therefore, failed to comply with the above-mentioned condition for a permit exemption, and violated the storage facility personnel training requirements.

On January 15, 2014, the EPA inspector received from Mr. Pederson, electronic copies of job descriptions for Rollprint employees that handle and/or manage hazardous waste. Based on that information, Rollprint has abated the violations of IAC §§ 722.134(a)(4) and 725.116(d) [40 CFR §§ 262.34(a)(4) and 265.16(d)].

2. A generator of used oil must label or mark containers and above ground tanks of used oil clearly with the words "Used Oil." See, 35 IAC 739.122 (c)(1) [40 CFR § 279.22(c)(1)].

At the time of the inspection, Rollprint had one 55-gallon container of used oil not marked or labeled with the words "Used Oil." Rollprint, therefore, violated the used oil storage requirement. However, this drum was labeled during the inspection. Based on that action, Rollprint has abated the violation of 35 IAC 739.122 (c)(1) [40 CFR 279.22(c)(1)].

3. A small quantity handler of universal waste must manage any lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. See 35 IAC § 733.113(d)(1) [40 CFR § 273.113(d)(1)].

At the time of the inspection, Rollprint was storing waste lamps in open containers and loose waste lamps without an adequate container or package as required.

On January 14, 2014, the EPA inspector received from Mr. Pederson electronic copies of photographs showing that the loose lamps were placed in closed containers and all

previously opened containers of waste lamps were closed as well. Based on that information, Rollprint is now in compliance with 35 IAC § 733.113(d)(1) [40 CFR § 273.13(d)(1)].

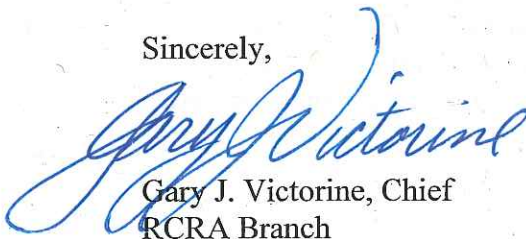
4. Upon failing to meet the conditions identified in item 1, Rollprint became an operator of a hazardous waste storage facility. Rollprint has not applied for or received a hazardous waste storage permit nor does Rollprint have interim status. Rollprint's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 329 IAC §§ 3.1-13-1; 3.1-13-2(1), (2), (3) and (4) and 3.1-13-3 through 3.1-13-17 [40 CFR §§ 270.1(c) and 270.13].

Rollprint abated the violation specified in item 1 in order to meet the conditions for a hazardous waste storage permit exemption. Rollprint, therefore, has abated the violation of 329 §§ 3.1-13-1; 3.1-13-2(1), (2), (3) and (4) and 3.1-13-3 through 3.1-13-17 [40 CFR §§ 270.1(c) and 270.13].

This letter is to inform you that EPA does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Illinois Environmental Protection Agency will continue to evaluate Rollprint in the future.

If you should have questions regarding this letter, please contact Ms. Burrus, of my staff, at (312) 886-3587.

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: todd.marvel@illinois.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

**INSTALLATION NAME:** Rollprint Packaging Products

**U.S. EPA ID. No.:** ILD 984 766 642

**LOCATION ADDRESS:** 320 S. Stewart Avenue  
Addison, Illinois 60101

**DATE OF INSPECTION:** January 13, 2014

**U.S. EPA INSPECTOR:** Sheila Burrus

**PREPARED BY:**

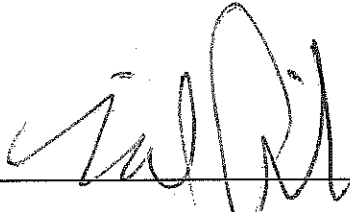


Sheila Burrus  
Environmental Protection Specialist

2/20/14

Date:

**REVIEWED BY:**



Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch  
Land and Chemicals Division

2-24-14

Date:



### **Purpose of Inspection**

The purpose of the inspection was to conduct an un-announced compliance evaluation inspection (CEI) at Rollprint Packaging Products, Inc. (Rollprint), located at 320 S. Stewart Avenue, Addison, Illinois, to evaluate Rollprint's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically those regulations related to the management of hazardous waste and used oil.

**Participants:** Mark Pederson, Environmental Health and Safety Manager represented Rollprint. Sheila Burrus represented EPA Region 5, Land and Chemicals Division.

### **Installation Description/Background**

Rollprint manufactures flexible and semi-rigid packaging materials for the medical, food, and industrial markets. Rollprint also applies flexographic printing to the packaging.

Some of the materials used to produce the flexible and semi-rigid packaging materials are Tyvex, Allegro, foil, polyester, and polyethylene. The materials are coated or laminated by using the following methods: extrusion or laminating, adhesive laminating, solution coating and blown film extrusion. Some of its customers are Baxter Healthcare, Surgical Solutions and Charter Medical.

Rollprint has one parts washer for the cleaning of its ink pans.

Rollprint has five satellite accumulation containers of hazardous waste located in the printing press (3) and laminator areas (2).

Rollprint was last inspected by the Illinois Environmental Protection Agency (IEPA) for compliance with RCRA on September 1, 2009.

A review of hazardous waste manifests and waste volume on-site indicates that Rollprint has been operating as a large quantity generator of hazardous waste.

### **Waste Generation**

Among the hazardous waste streams generated at this installation are spent adhesive, spent adhesive pads, waste ink and spent solvent.

The spent adhesive/pads are generated from spills/clean-up. The spent solvent is generated from equipment cleaning.



Rollprint generates stripper waste from the stripping of flammable storage cabinets and anilox rollers maintenance operations.

Rollprint also generates used oil/filters and waste lamps. The used oil and filters are generated from maintenance operations of the hot oil unit and hydraulic system.

### **Opening Conference**

I arrived at Rollprint at 10 a.m. on January 13, 2014. I introduced myself to Mark Pederson, Environmental Health and Safety Manager. I then presented my enforcement credentials to Mr. Pederson and told him the purpose of my visit. Mr. Pederson and I convened in his office where I explain that I would be conducting a CEI that included a visual site inspection (VSI) and records review. I explained to him what specific records I would need to review and then asked him for a brief description of the type of work done at this installation and the types of wastes generated. Mr. Pederson began to provide background and waste stream information about Rollprint which is included in the installation description/background and waste generation sections of this report.

I provided a Small Business Resource Information Sheet, the Keys to Success brochure, the U.S. EPA – Region 5 Pollution Prevention Technical Assistance Contacts list and the U.S. EPA Managing Used Oil Advice for Small Business brochure to Mr. Pederson.

I informed Mr. Pederson that Rollprint could claim any information gathered during the inspection as Confidential Business Information (CBI) including: verbal information, documents and photographs. Mr. Pederson did not make a CBI claim on the information gathered during the inspection.

I continued the opening conference by asking Mr. Pederson who picks up Rollprint's hazardous waste. Mr. Pederson indicated that Univar USA located in Chicago, Illinois picks up Rollprint's waste and transports it to Systech Environmental Corporation located in Fredonia, Kansas and/or Safety Kleen Systems, Inc. located in Dolton, Illinois.

Rollprint's used oil is transported to Vexor Technology, Inc. located in Medina, Ohio and/or Future Environmental located in Mokena, Illinois for disposal.

Lightening Resources located in Greenwood, Indiana picks up waste lamps/batteries.

I began the CEI by conducting the records review portion of the inspection.

## **Records Review**

I began the records review portion of the inspection with the assistance of Mr. Pederson. I informed Mr. Pederson that I wanted to review hazardous waste manifests, weekly inspection logs for the 90 day hazardous waste storage area, training records and annual reports for the years 2011 through 2013. I also requested land disposal restriction forms, waste analysis data and most current contingency plan.

My observations are categorized below:

### **Personnel Training/Job Descriptions**

Rollprint's job descriptions do not include the type and amount of both introductory and continuing annual training for its employees that handle and/or manage hazardous waste. I received documentation via email on January 15, 2014, showing that the type and amount of both introductory and continuing annual training for its employees that handle and/or manage hazardous waste has been added to the job descriptions.

I reviewed all of the remaining records and found them to be complete.

## **Visual Site Inspection (VSI)**

After the records review, I was accompanied by Mr. Pederson during the VSI portion of the inspection. The areas of Rollprint facility inspected included, but not limited to: incoming goods warehouse, pouch room, laminator area, core storage area, in-process storage area, mounting department, 90-day hazardous waste flammable storage area, ink storage room, printing staging area, shipping staging area, finish goods warehouse, slitting department and universal waste storage area.

The following is a summary of information obtained while touring the plant.

- There was one closed/labeled 55-gallon satellite accumulation container of spent adhesive waste in a flammable storage cabinet located in the laminator area (Photograph 1).
- There were three closed/labeled 55-gallon satellite accumulation containers of waste ink/spent solvent (waste flammable liquids) located in the printing process area near three printing presses (Photograph 2).

- There were twenty 55-gallon drums of spent adhesives and solvent next to the 90-day hazardous waste/flammable storage room, as well as raw material and used oil (Photograph 3).
- There was one unlabeled 55-gallon drum of used oil located next to the 90-day hazardous waste/flammable storage area. A used oil label was immediately placed on the drum (Photographs 4 and 5).
- There was one labeled 55-gallon drum of stripper waste located next to the 90-day hazardous waste/flammable storage area (Photograph 6).
- There were open containers/loose waste lamps being stored in the universal storage area which is located in the 345 warehouse (Photographs 7 through 10).
- There were two closed/labeled 5-gallon containers of waste batteries located in the 345 warehouse (Photograph 11).
- Additional photographs of the numerous departments throughout the facility (Photographs 12 through 24).

In walking through the Rollprint facility, I observed the presence of fire extinguishers on-site.

### **Closing Conference**

In closing, a brief conference was held. I summarized where Mr. Pederson had taken me during the VSI and what information was presented to me. I summarized my concerns to Mr. Pederson who was in attendance at the closing conference. I thanked him for his cooperation and concluded the CEI at approximately 1:15 p.m.

Attachment

Inspection Checklist  
Photographs 1 through 24





**PHOTOGRAPH #24**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

Adhesive laminator

**SCENE BEING PHOTOGRAPHED:**

Jet Lamps

**SITE LOCATION:**

320 S. Stewart Avenue

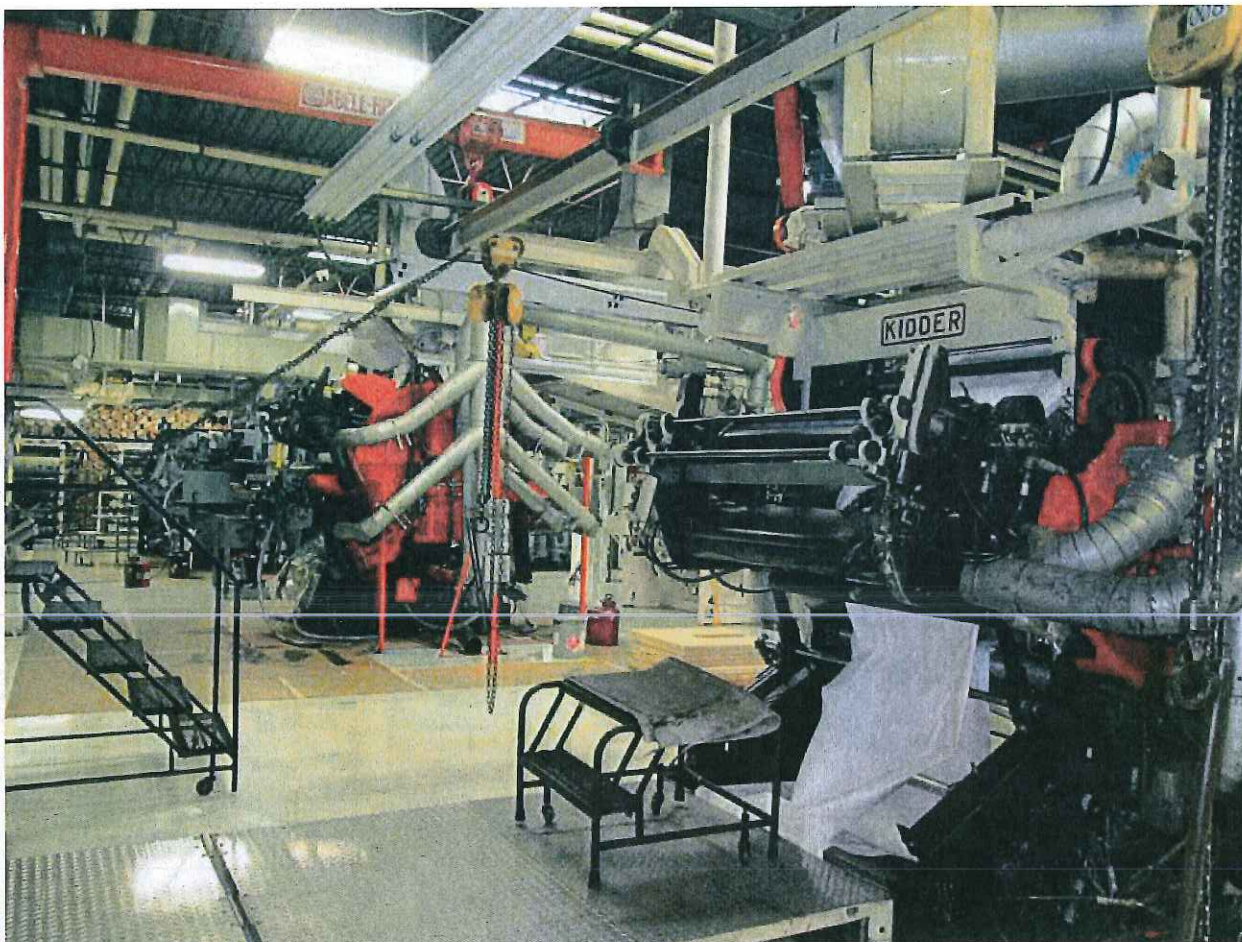
Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642



PHOTOGRAPH #23

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

January 13, 2014

LOCATION OF PHOTOGRAPH:

Printing Press Area

SITE LOCATION:

320 S. Stewart Avenue

Addison, Illinois

INSTALLATION NAME:

Rollprint Packaging Products, Inc.

INSTALLATION I.D. #

ILD 984 766 642





**PHOTOGRAPH #22**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

Slitting Good Department

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642



**PHOTOGRAPH #21**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

Finished Goods Warehouse

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642





**PHOTOGRAPH #20**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**SCENE BEING PHOTOGRAPHED:**

Shipping Staging Area

**SITE LOCATION:**

320 S. Stewart Avenue

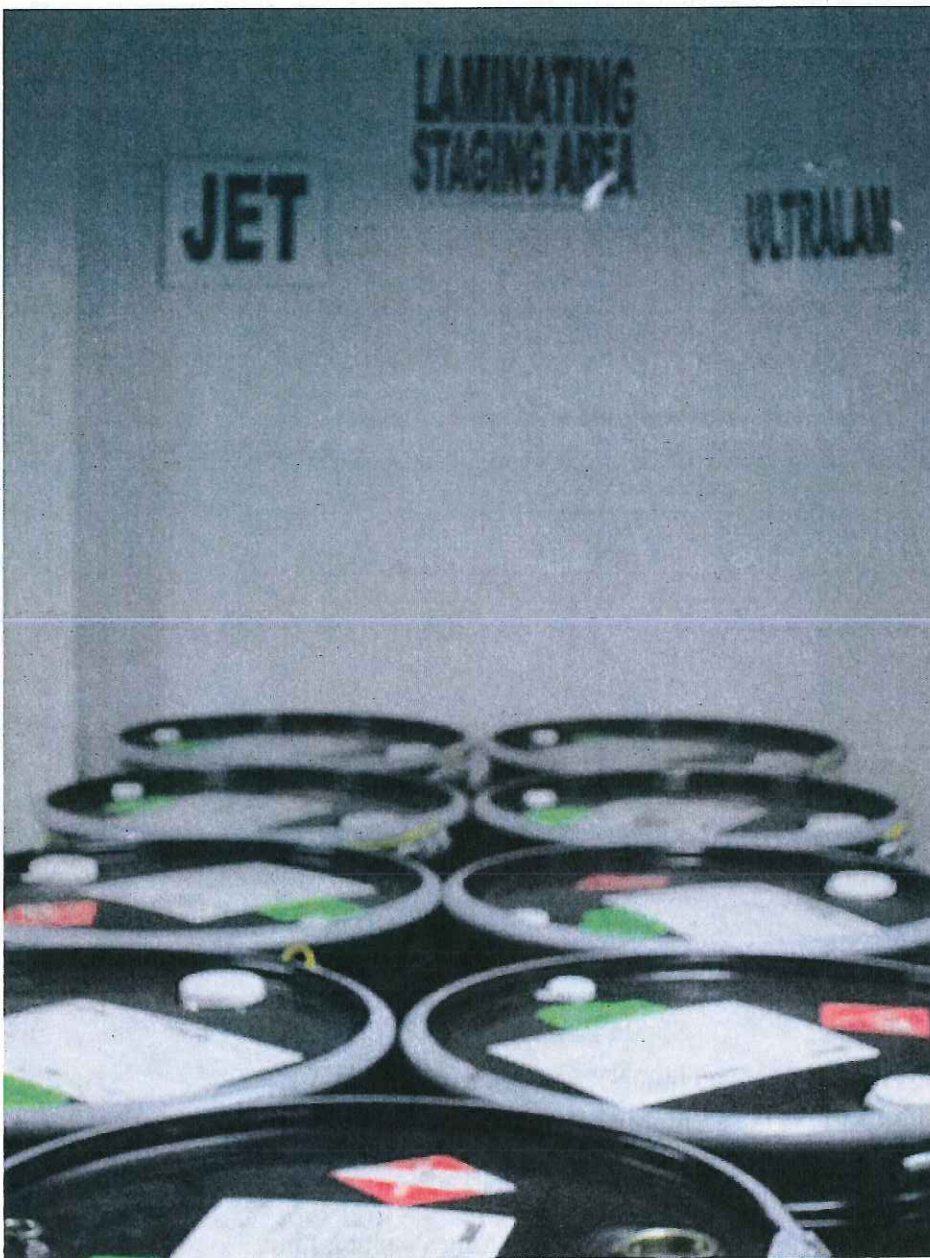
Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642



PHOTOGRAPH #19

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

January 13, 2014

SCENE BEING PHOTOGRAPHED:

Laminating Staging Area

SITE LOCATION:

320 S. Stewart Avenue

Addison, Illinois

INSTALLATION NAME:

Rollprint Packaging Products, Inc.

INSTALLATION I.D. #

ILD 984 766 642





PHOTOGRAPH #18

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

January 13, 2014

SCENE BEING PHOTOGRAPHED:

Ink Storage Area

SITE LOCATION:

320 S. Stewart Avenue

Addison, Illinois

INSTALLATION NAME:

Rollprint Packaging Products, Inc.

INSTALLATION I.D. #

ILD 984 766 642



PHOTOGRAPH #17

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

January 13, 2014

SCENE BEING PHOTOGRAPHED:

Mounting Department

SITE LOCATION:

320 S. Stewart Avenue

Addison, Illinois

INSTALLATION NAME:

Rollprint Packaging Products, Inc.

INSTALLATION I.D. #

ILD 984 766 642





**PHOTOGRAPH #16**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**SCENE BEING PHOTOGRAPHED:**

Flexirollers for printers

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642



PHOTOGRAPH #15

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

January 13, 2014

LOCATION OF PHOTOGRAPH:

In-process storage materials

SITE LOCATION:

320 S. Stewart Avenue

Addison, Illinois

INSTALLATION NAME:

Rollprint Packaging Products, Inc.

INSTALLATION I.D. #

ILD 984 766 642





**PHOTOGRAPH #14**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**SCENE BEING PHOTOGRAPHED:**

Core Storage Area

**SITE LOCATION:**

320 S. Stewart Avenue

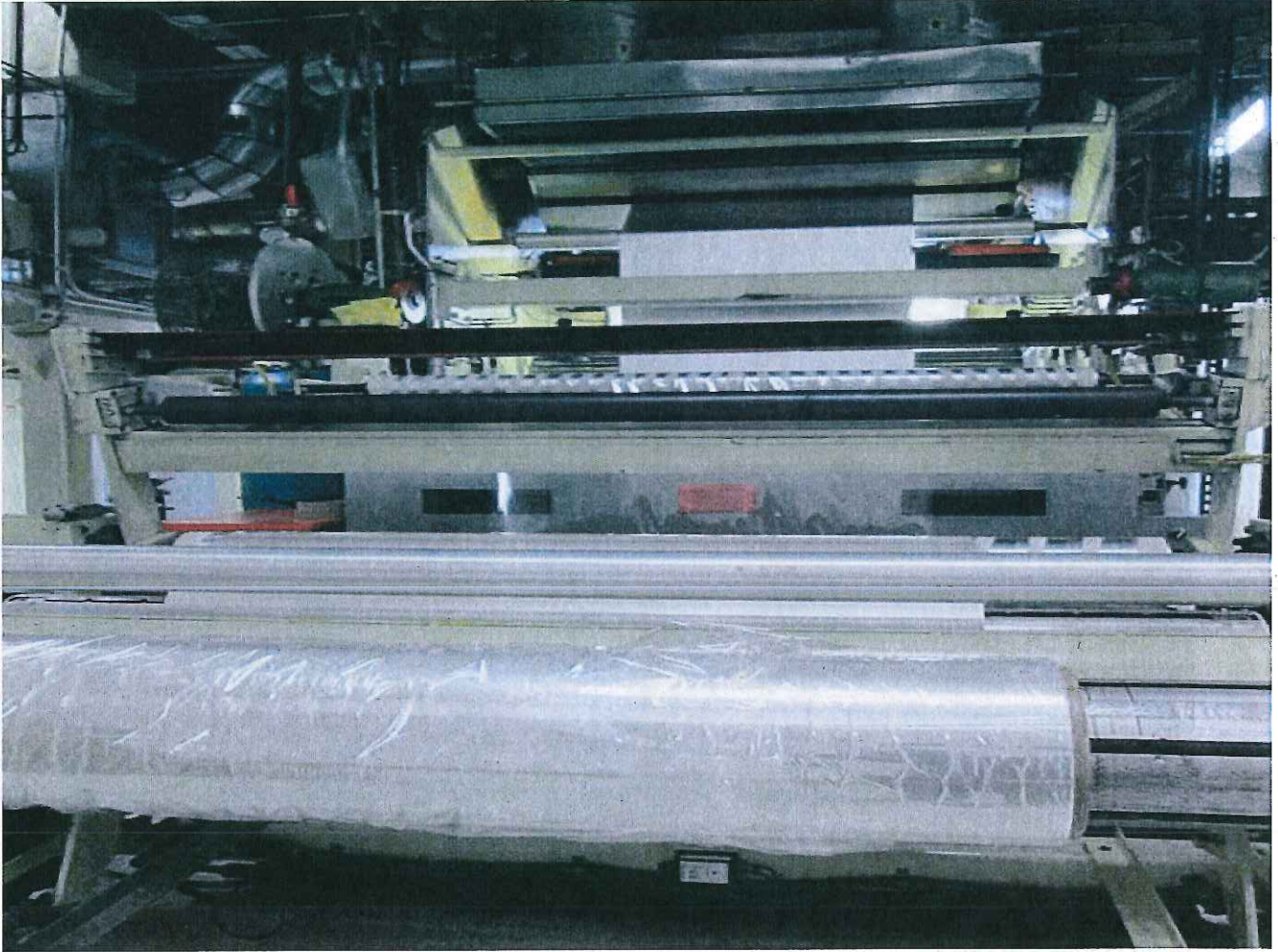
Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642



PHOTOGRAPH #13

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

January 13, 2014

LOCATION OF PHOTOGRAPH:

Pouch Room

SCENE BEING PHOTOGRAPHED:

Film

SITE LOCATION:

320 S. Stewart Avenue

Addison, Illinois

INSTALLATION NAME:

Rollprint Packaging Products, Inc.

INSTALLATION I.D. #

ILD 984 766 642





**PHOTOGRAPH #12**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

incoming goods warehouse

**SCENE BEING PHOTOGRAPHED:**

incoming raw materials

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

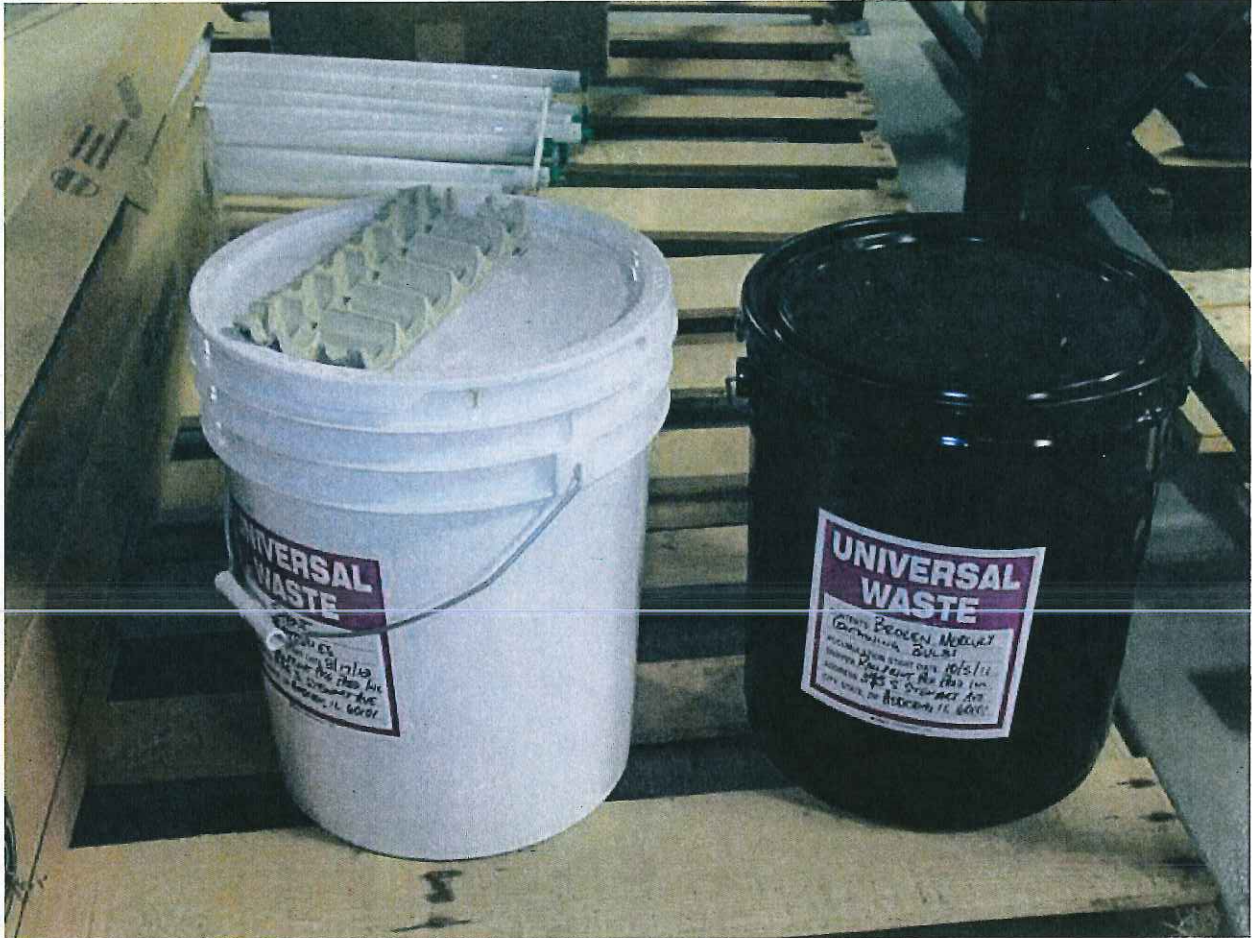
**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642





**PHOTOGRAPH #11**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

345 Warehouse

**SCENE BEING PHOTOGRAPHED:**

two closed/labeled 5-gallon containers of waste batteries

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642



**PHOTOGRAPH #10**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

345 warehouse

**SCENE BEING PHOTOGRAPHED:**

open containers/loose universal waste lamps

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642





**PHOTOGRAPH #9**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

345 warehouse

**SCENE BEING PHOTOGRAPHED:**

loose universal waste lamps

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642





**PHOTOGRAPH #8**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

345 warehouse

**SCENE BEING PHOTOGRAPHED:**

open containers universal waste lamps

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642





**PHOTOGRAPH #7**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

345 warehouse

**SCENE BEING PHOTOGRAPHED:**

open containers/loose universal waste lamps

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

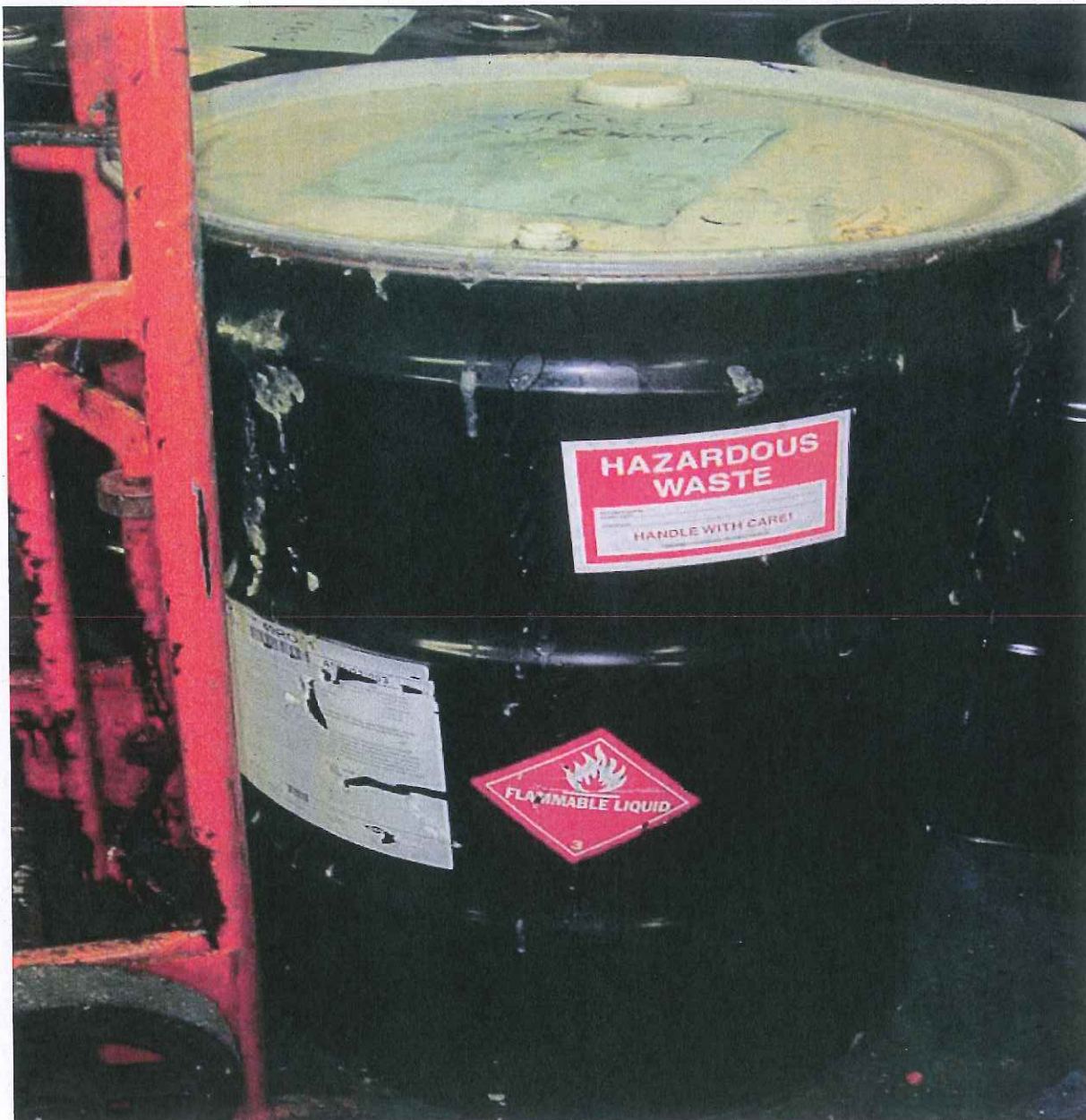
**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

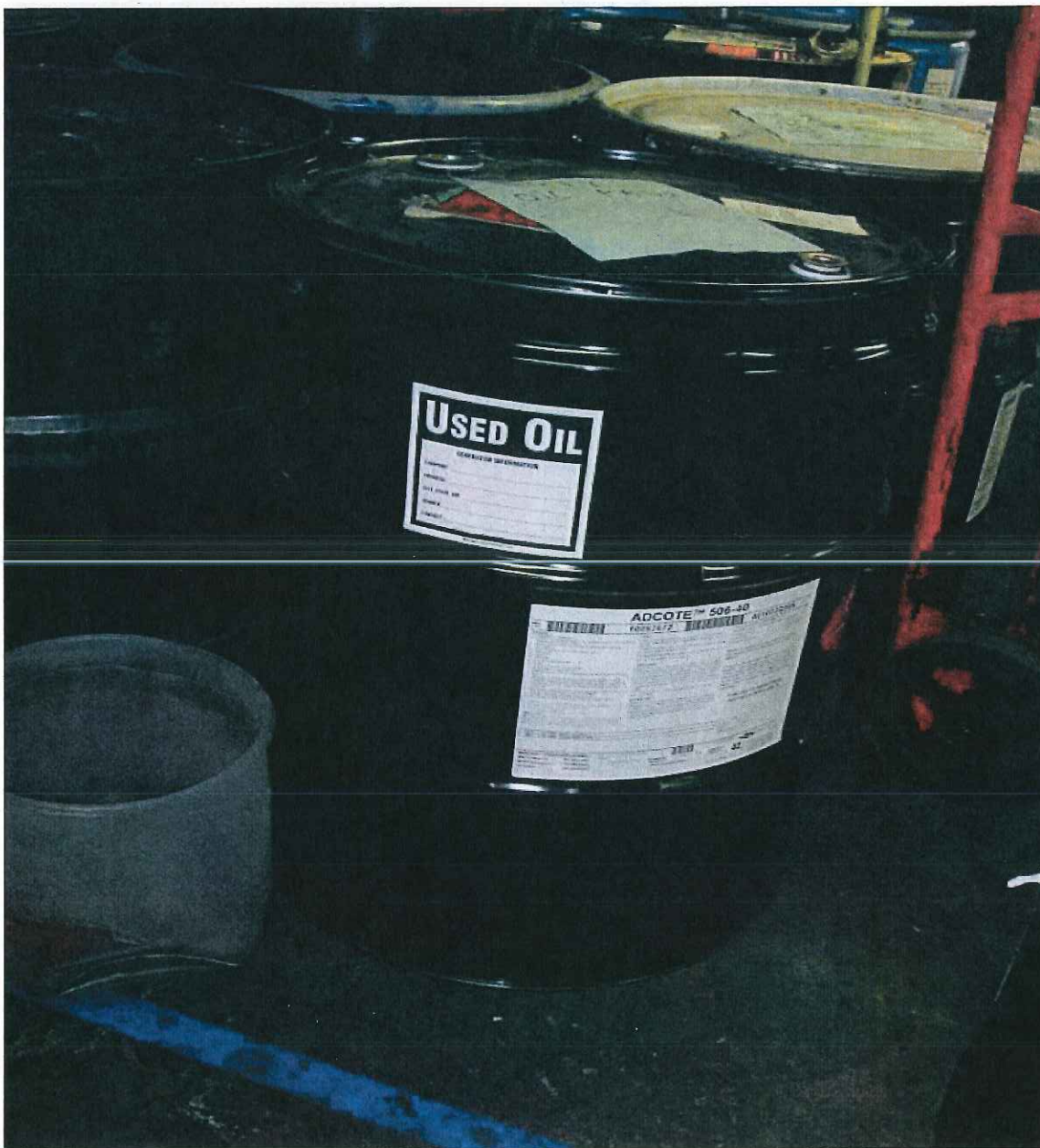
ILD 984 766 642





**PHOTOGRAPH #6**

NAME OF PHOTOGRAPHER:	Sheila Burrus
DATE OF PHOTOGRAPH:	January 13, 2014
LOCATION OF PHOTOGRAPH:	90-day hazardous waste/flammable storage area
SCENE BEING PHOTOGRAPHED:	55-gallon drum of hazardous stripper waste
SITE LOCATION:	320 S. Stewart Avenue Addison, Illinois
INSTALLATION NAME:	Rollprint Packaging Products, Inc.
INSTALLATION I.D. #	ILD 984 766 642



**PHOTOGRAPH #5**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

90-day hazardous waste/flammable storage area

**SCENE BEING PHOTOGRAPHED:**

labeled 55-gallon drum of used oil

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

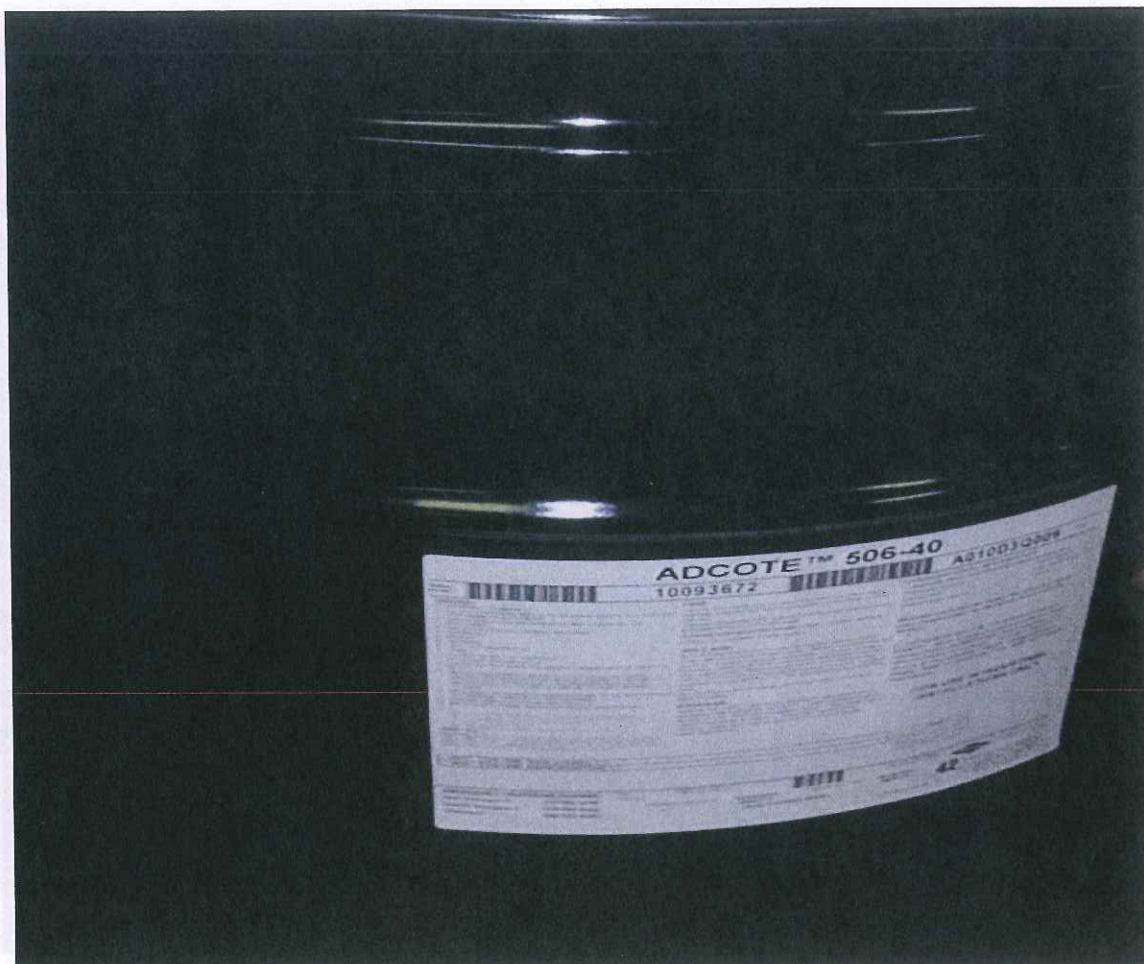
**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642





**PHOTOGRAPH #4**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

90-day hazardous waste/flammable storage area

**SCENE BEING PHOTOGRAPHED:**

unlabeled used oil drum

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642



**PHOTOGRAPH #3**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

90-day hazardous waste/flammable storage area

**SCENE BEING PHOTOGRAPHED:**

twenty 55-gallon drums of hazardous waste (printing press and laminator waste)

**SITE LOCATION:**

320 S. Stewart Avenue

Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642





**PHOTOGRAPH #2**

**NAME OF PHOTOGRAPHER:**

Sheila Burrus

**DATE OF PHOTOGRAPH:**

January 13, 2014

**LOCATION OF PHOTOGRAPH:**

Printing Press Area

**SCENE BEING PHOTOGRAPHED:**

55-gallon satellite accumulation container of waste  
flammable liquid

**SITE LOCATION:**

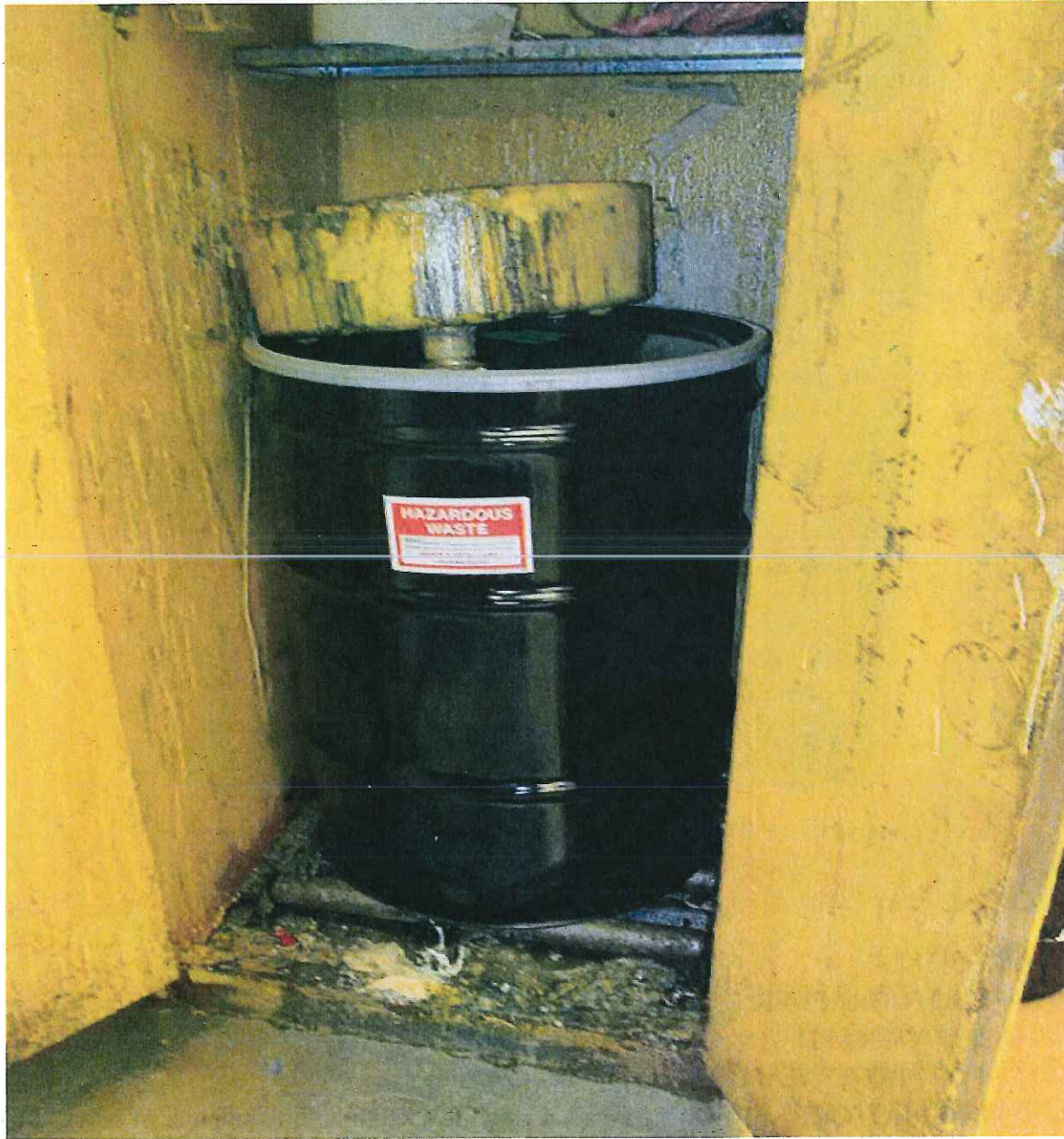
320 S. Stewart Avenue  
Addison, Illinois

**INSTALLATION NAME:**

Rollprint Packaging Products, Inc.

**INSTALLATION I.D. #**

ILD 984 766 642



**PHOTOGRAPH #1**

<b>NAME OF PHOTOGRAPHER:</b>	Sheila Burrus
<b>DATE OF PHOTOGRAPH:</b>	January 13, 2014
<b>LOCATION OF PHOTOGRAPH:</b>	Permanent Total/Enclosed Area
<b>SCENE BEING PHOTOGRAPHED:</b>	closed/labeled 55-gallon drum of spent adhesive
<b>SITE LOCATION:</b>	320 S. Stewart Avenue Addison, Illinois
<b>INSTALLATION NAME:</b>	Rollprint Packaging Products, Inc.
<b>INSTALLATION I.D. #</b>	ILD 984 766 642



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(a)		722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used:	722.120(d)
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator:	
722.123(a)	- signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b>	
722.130	Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a))	<b>Section 722.134 Accumulation Time</b> Has the generator complied with the following requirements: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	If "No", go to Subpart J.	
	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b>	
(725.211)	Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p><b>Section 725.278 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> If "No", go to Subpart C.</p> <p><b>SUBPART J: TANK SYSTEMS</b></p> <p>Has the generator closed an accumulation area?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the facility accumulate or treat hazardous waste in tanks?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	<p>725.211</p> <p>725.214</p>
(725.211) (725.214)		
(725.290)		



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks <b>existing</b> prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____  *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____  <b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For <b>new</b> tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service?  Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?  Yes _____ No _____ N/A _____</p> <p>or  if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?  Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?  Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?  Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> <li>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure?  Yes _____ No _____ N/A _____</li> <li>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift?  Yes _____ No _____ N/A _____</li> <li>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours?  Yes _____ No _____ N/A _____</li> <li>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?  Yes _____ No _____ N/A _____</li> </ol> <p>and  is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> <li>1) a liner (external to the tank); or</li> <li>2) a vault; or</li> <li>3) a double-walled tank; or</li> <li>4) an equivalent device (approved by the Board)?  Yes _____ No _____ N/A _____</li> </ol>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)?  Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p><b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release?  Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection?  Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water?  Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release?  Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system?  Yes _____ No <u>  X  </u> N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?  Yes _____ No <u>  X  </u> N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair?  Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?  Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?  Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system?  Yes _____ No _____ N/A <u>✓</u></p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:  - the resulting waste, mixture or dissolved material is no longer ignitable or reactive?  Yes _____ No <u>✓</u> N/A _____</p> <p>- Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?  Yes _____ No _____ N/A <u>✓</u></p> <p>or</p> <p>Is the tank used solely for emergencies?  Yes _____ No _____ N/A <u>✓</u></p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?  Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank?  Yes _____ No _____ N/A <u>✓</u></p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?  Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?  Yes _____ No _____ N/A <u>✓</u></p> <p>COMMENTS:</p>	
(725.302)	<p><b>Section 725.302 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725?  Yes _____ No _____ N/A <u>✓</u></p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b>  Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: <i>Paging System</i> a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> <li>- police and fire departments? Yes <u>✓</u> No _____ N/A _____</li> <li>- hospitals? Yes <u>✓</u> No _____ N/A _____</li> <li>- contractors? Yes <u>✓</u> No _____ N/A _____</li> <li>- emergency response teams? Yes <u>✓</u> No _____ N/A _____</li> </ul>	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <u>✓</u> No _____ N/A _____</p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> <li>- description? Yes <u>✓</u> No _____ N/A _____</li> <li>- capability? Yes <u>✓</u> No _____ N/A _____</li> <li>- location? Yes <u>✓</u> No _____ N/A _____</li> </ul> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <u>✓</u> No _____ N/A _____</p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> <li>- an evacuation plan? Yes <u>✓</u> No _____ N/A _____</li> <li>- an evacuation signal? Yes <u>✓</u> No _____ N/A _____</li> <li>- alternate evacuation routes? Yes <u>✓</u> No _____ N/A _____</li> </ul>	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes _____ No _____ N/A _____</p> <p>b) submitted to:</p> <ul style="list-style-type: none"> <li>- police department? Yes <u>✓</u> No _____ N/A _____</li> <li>- fire department? Yes <u>✓</u> No _____ N/A _____</li> <li>- hospital? Yes <u>✓</u> No _____ N/A _____</li> <li>- emergency response teams? Yes <u>✓</u> No _____ N/A _____</li> </ul>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <u>✓</u> No _____ N/A _____</p> <p>b) the plan fails in an emergency? Yes <u>✓</u> No _____ N/A _____</p> <p>c) the facility changes in a way that modifies the emergency response necessary?</p> <p>Yes <u>✓</u> No _____ N/A _____</p> <p>d) information regarding emergency coordinators changes?</p> <p>Yes <u>✓</u> No _____ N/A _____</p> <p>e) information regarding equipment changes?</p> <p>Yes <u>✓</u> No _____ N/A _____</p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times?</p> <p>Yes <u>✓</u> No _____ N/A _____</p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?</p> <p>Yes <u>✓</u> No _____ N/A _____</p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?</p> <p>Yes <u>✓</u> No _____ N/A _____</p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p><b>Note:</b> If the facility has had a release, explain in detail.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p><b>Section 725.116 Personnel Training</b></p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- shutdown of operations? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ol>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	<p><b>Section 728.107 Waste Analysis and Recordkeeping</b></p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the plan on-site?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
722.134(c)	<p><b>Section 722.134 Satellite Accumulation</b></p> <p>Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste complied with the requirements of Section 722.134(a) within 3 working days?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If there are more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
722.134(g)	<p><b>Note:</b> A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.</p>	
	<p><b>SUBPART D: RECORDKEEPING AND REPORTING</b></p>	
722.140(a)	<p><b>Section 722.140 Recordkeeping</b></p> <p>Has the generator retained for a period of 3 years:</p> <p>- a copy of each signed manifest?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	722.140(a)
722.140(b)	<p>Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	722.140(b)
722.140(c)	<p>Has the generator retained for a period of 3 years:</p> <p>- copies of test results, waste analyses or other determinations made in accordance with Section 722.111?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	722.140(d)
722.141(a)	<p><b>Section 722.141 Annual Reporting</b></p> <p>Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.</p>	722.141(a)



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>Section 722.142 Exception Reporting</b>	722.141(b)
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
		722.142(a)(2)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b>	722.143
722.150	Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b>	722.150
722.160	Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>SUBPART G: FARMERS</b>	722.160
722.170	Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	COMMENTS:	722.170





October 13, 2006

Jamie Paulin  
U.S. EPA  
77 West Jackson Boulevard, DE-9J  
Chicago, IL 60604-3590

Re: CAFO Docket No: RCRA-05-2004-0018  
Quarterly Status Report

Dear Jamie

In accordance with Paragraph 21.b, Rollprint Packaging Products is submitting a quarterly status report on the implementation of its Environmental Management System.

The EHS Manager spent approximately 30 hours maintaining the Environmental Management System program. Activities that occurred during the quarter included inspection and documenting environmental compliance per the EMS procedures and initiating one Corrective Action discovered during a routing inspection. The Corrective Action was completed within two weeks, which involved the retraining of certain employees.

Secretarial support spent approximately 2 hours copying and distributing forms to the affected locations.

During the next quarter, Rollprint will conduct an EMS audit of a Hazardous Waste Treatment facility that Rollprint utilizes, which was postponed from the last quarter due to activities occurring at the plant. In addition to the Audit, Rollprint will be holding management meetings to discuss issues that arise during the implantation phase, any non-compliance issues, and results from any of the audits conducted.

If you have any additional questions, please call me at (630) 628-1700.

Sincerely

Mark E. Pederson  
Environmental, Health & Safety Manager

cc: Dhuane Dodrill, President  
Mike Berman, U.S. EPA





July 6, 2006

Jamie Paulin  
U.S. EPA  
77 West Jackson Boulevard, DE-9J  
Chicago, IL 60604-3590

Re: CAFO Docket No: RCRA-05-2004-0018  
Quarterly Status Report

Dear Jamie

In accordance with Paragraph 21.b, Rollprint Packaging Products is submitting a quarterly status report on the implementation of its Environmental Management System.

The EHS Manager spent approximately 70 hours developing the Environmental Management Training program. An additional 7 hours was spent preparing and training 28 relevant employees on the Environmental Management System. An additional 10 hours was spent making changes to EMS reporting forms, reflecting changes to the company

Secretarial support involved the printing, organizing and distribution of the EMS manuals to the appropriate departments. The secretarial support spent approximately 40 hours completing this task. Secretarial support spent an additional 2 hours copying and distributing revised forms to the appropriate books and affected locations.

During the next quarter, Rollprint will conduct an EMS audit of a Hazardous Waste Treatment facility that Rollprint utilizes, and update EMS Procedures and Forms as necessary. In addition to those items above, Rollprint will be holding management meetings to discuss issues that arise during the implantation phase, any non-compliance issues, and results from any of the audits conducted.

If you have any additional questions, please call me at (630) 628-1700.

Sincerely

Mark E. Pederson  
Environmental, Health & Safety Manager

cc: Dhuanne Dodrill, President  
Mike Berman, U.S. EPA



April 12, 2006

Jamie Paulin  
U.S. EPA  
77 West Jackson Boulevard, DE-9J  
Chicago, IL 60604-3590

Re: CAFO Docket No: RCRA-05-2004-0018  
Interim Status Report

Dear Jamie

In accordance with Paragraph 21.b, Rollprint Packaging Products is submitting a status report on the implementation of its Environmental Management System.

Rollprint Packaging Products, Inc. developed the Environmental Management System (EMS) over the nine month period stipulated in the CAFO. Prior to the development of the EMS, Mark Pederson attended a training program titled "Implementing an EMS".

Rollprint spent approximately 900 hours developing the EMS Document, Procedures, and Forms. An additional 20 hours was spent for the training session, and 30 hours revising the Procedures and Forms, based on upper management comments. During the course of the development stage, one (1) planning meeting and two (2) progress report meetings were held with upper management. Each of these meetings lasted approximately one hour. Upper management spent 15 hours reviewing the draft EMS Document, Procedures and Forms.

Secretarial support involved the final printing of the documents, distributing the documents for official approval and signature, and organizing the procedures into the correct books, and preparing the documents for submittal to US EPA. The secretarial support spent approximately 70 hours completing this task. Another 10 hours of secretarial support is expected for the copying of all the Procedures and Form, organizing them in the correct books, and distributing the final books to the appropriate work areas.

In the coming year, Rollprint Packaging Products will conduct EMS training for all affected employees (scheduled for May, 2006). In addition to the training, Rollprint will conduct an EMS audit of a Hazardous Waste Treatment facility that Rollprint utilizes, an internal audit of its EMS System and contract a third party audit of Rollprint's EMS System. Upon completion of the internal audit and third party audit, Rollprint will make the necessary changes to its procedures, if necessary.

U.S. EPA Region 5  
April 12, 2006

In addition to those items above, Rollprint will be holding management meetings to discuss issues that arise during the implantation phase, any non-compliance issues, and results from any of the audits conducted.

If you have any additional questions, please call me at (630) 628-1700.

Sincerely



Mark E. Pederson  
Environmental, Health & Safety Manager

cc: Dhuanne Dodrill, President  
Mike Berman, U.S. EPA

---





December 8, 2005

Jamie Paulin  
U.S. EPA  
77 West Jackson Boulevard, DE-9J  
Chicago, IL 60604-3590

Re: Environmental Management System

Dear Jamie

Enclosed is Rollprint Packaging Products, Inc. Environmental Management System, as required under the CAFO. Rollprint Packaging Products, Inc. looks forward to your review and approval of this program as we anticipate implementing the system by February 1, 2006.

If you have any additional questions, please call me at (630) 628-1700.

Sincerely

Mark E. Pederson  
Environmental, Health & Safety Manager

cc: Dhuanne Dodrill, President & COO w/o Attachment

encl.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

C-14J

MAR 15 2005

Honorable William B. Moran, ALJ  
Office of Administrative Law Judges  
U.S. Environmental Protection Agency  
Ariel Rios Building, Mailcode 1900L  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

Re: Rollprint Packaging Products, Inc.  
RCRA-05-2004-0018

Dear Judge Moran:

Enclosed please find a signed copy of the Consent Agreement and Final Order (CAFO) in the matter of Rollprint Packaging Products, Inc (Rollprint) that was filed with the Regional Hearing Clerk.

If you have any questions, please telephone me at (312) 886-6837. Thank you for your help in resolving this case.

Sincerely yours,

A handwritten signature in cursive script that reads "Michael R. Berman".

Michael R. Berman  
Associate Regional Counsel

Enclosure

cc: Mark Pederson

bcc: Jamie Paulin (DE-9J)



## WEEKLY REPORT

### **U.S. EPA FILES CONSENT AGREEMENT AND FINAL ORDER AGAINST Rollprint Packaging Products, Inc.**

On 5/11/, 2005, Region 5 filed a Consent Agreement and Final Order (CAFO) against Rollprint Packaging Products, Inc. located at 320 South Stewart Avenue and 335 South Stewart Avenue, Addison, Illinois. The CAFO alleges that the company violated hazardous waste laws by failing to keep satellite accumulation containers closed when not in use, by failing to minimize the possibility of fire, explosion or release, by failing to have emergency coordinator name and telephone number next to telephone, by failing to have location of fire extinguishers and spill control equipment next to the telephone, and by failing to file a permit application required and thereby operating without a permit. The CAFO requires a civil penalty of \$5373 and a total expenditure for a Supplemental Environmental Project of not less than \$109,787, specifically implementation of an Environmental Management System.

CONTACT: Jamie Paulin, ECAB, 886-1771  
Michael Berman, ORC, 886-6837 (ECA)

## **ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH**

### **WEEKLY REPORT**

#### **U.S. EPA FILES ADMINISTRATIVE COMPLAINT AGAINST ROLLPRINT PACKAGING PRODUCTS, INC.**

On \_\_\_\_\_, 2004, Region 5 filed an Administrative Complaint against Rollprint Packaging Inc., 320 South Stewart Avenue and 335 South Stewart Avenue, Addison, Illinois. The Administrative Complaint alleges that the company violated State law by failing to, 1) keep satellite accumulation containers containing hazardous waste closed when not in use 2) minimize the possibility of fire, explosion or release, 3) post the emergency coordinator's name and telephone number next to the telephone, 4) post the location of the fire extinguishers and spill control equipment next to the telephone, 5) file the proper permit application for a hazardous waste storage permit within 30 days after its first noncompliance with any condition for an exemption from a permit, in 35 IAC § 722.134. The Complaint proposes a civil penalty of \$27,665.

CONTACT: Jamie L. Paulin, ECAB, 312-886-1771  
Michael Berman, ORC, 312-886-6837

**(ECA)**



# RCRA 3008(a) CONSENT AGREEMENT AND FINAL ORDER CONCURRENCE/ROUTING FORM

## PART I. Background

FACILITY NAME Kollerprint Packaging  
EPA ID# 120 984 766 42 / 120 000 099 429  
ECAB ASSIGNEE Jamie Pania  
PHONE 312-886-1771

DOCKET NUMBER RCRA-05-2004-0018  
ASST. REG. COUNSEL Michael Berman  
PHONE 312-886-6837

## PART II. Proposed CAFO and Concurrences—The proposed CAFO package must include the following documents:

- Tab 1. Transmittal letter to Respondent's attorney
- Tab 2. Proposed CAFO (2 copies)
- Tab 3. Settlement penalty calculation sheets and BEN
- Tab 4. Initial complaint (or most recently amended)
- Tab 5. Initial complaint penalty calculation sheets and BEN
- Tab 6. Draft press release.

	INITIALS	DATE	CONCUR	CONCUR WITH MODIFICATIONS
1. ECAB ASSIGNEE	<i>JAP</i>	<i>1/24/05</i>	✓	
2. ECAB SEC. CHIEF	<i>Ling</i>	<i>1/25/05</i>		✓
3. ASST. REG. COUNSEL	<i>attache</i>	<i>1/25/05</i>		
4. ECAB CHIEF	<i>JMB</i>	<i>1/31/05</i>	✓	

The ECAB Chief returns the proposed CAFO package to the ECAB Assignee for corrections, if necessary, and for delivery to the Asst. Regional Counsel who will send two copies of the proposed CAFO to the Respondent.

## PART III. Final CAFO Concurrences and Signature—After the Respondent has signed both copies of the proposed CAFO, the final CAFO package must include the following documents:

- Tab 1. Memorandum to WPTD Director
- Tab 2. Transmittal letter
- Tab 3. Both CAFOs, bearing the original signature of the Respondent
- Tab 4. The completed CCDS and RCRAinfo Form
- Tab 5. Addressed envelopes, Certified Mail/Return Receipt documents, and Certificate of Service
- Tab 6. Final press release and weekly report submittal.

	INITIALS	DATE	CONCUR
1. ECAB ASSIGNEE	<i>JAP</i>	<i>2/25/05</i>	✓
2. ECAB SEC. CHIEF	<i>Ling</i>	<i>3/2/05</i>	✓
3. ASST. REG. COUNSEL	<i>MB</i>	<i>2/25/05</i>	✓
4. ORC SECTION CHIEF	<i>MB for CLP</i>	<i>2/25/05</i>	✓
5. ECAB CHIEF	<i>JMB</i>	<i>3/8/05</i>	✓
6. DIRECTOR, WPTD	<i>WPTD for MG</i>	<i>3/10/05</i>	✓
7. REGIONAL ADM. (multi-statute only)			

After signing, return the entire package to the Administrative Program Assistant (DE-9J) for filing with the Regional Hearing Clerk.

## PART IV. Filing and Mailing

Date filed 3/11/05 Initials [Signature] (Administrative Program Assistant or, if needed, Section Secretary)  
Date mailed 3/11/05 Initials [Signature] (The Section Secretary will mail and distribute the copies.)



## OFFICE OF REGIONAL COUNSEL CONCURRENCE SHEET

SUBJECT: Rollprint Packaging Products, Inc.  
Proposed AOC

CONTROL NO. (if applicable): \_\_\_\_\_

Originator and first level supervisor are responsible for assuring that documents are in plain language. All other reviewers should consider plain language in their reviews. See plain language checklist on reverse side of this sheet.

Originator	( M. Berman )	MB	Date	1/14/05
Section Chief	( C. Puchalski )	CWP	Date	11/18/05 <i>in R. Conestoga</i>
Branch Chief	( Nelson/Cohen )		Date	
Deputy RC	( Frey )		Date	
Regional Counsel	( Frey (Acting) )		Date	

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(PLEASE INDICATE NAME OF APPROPRIATE DIVISION(S) WHERE CONCURRENT SIGNOFF IS NECESSARY)

NAME OF DIVISION Wastes, Pesticides & Toxics

Assigned Staff Person	( J. Paulin )		Date	
Division Director	( )		Date	
Other	( )		Date	
Other	( )		Date	

## OFFICE OF THE REGIONAL ADMINISTRATOR

Other	( )		Date	
Other	( )		Date	
Deputy Regional Administrator	( Mathur )		Date	
Regional Administrator	( Skinner )		Date	

COMMENTS: Return to Michael Berman  
for Mailing. 6-6837 C-14J  
\_\_\_\_\_

## Plain Language Checklist

**Write in the active voice.** When you use the active voice, the subject of the sentence acts: "EPA issued the permit to X." When you use the passive voice, the subject of the sentence is acted upon: "The permit was issued to X." If you can ask "By whom?" or "By what?" after the verb, the verb is in the passive voice. A passive verb has a form of the verb "to be" (am, is, are, was, were, be, being, been) plus a main verb usually ending in "en" or "ed."

**Use action verbs.** Use base verbs instead of nouns derived from verbs.

Don't Say	Say	Don't Say	Say
is applicable to	applies to	make payment	pay
give consideration to	consider	take action	act

**Use personal pronouns to represent the reader and to refer to EPA.** For example, "The United States Environmental Protection Agency is issuing an order to X (you). We are offering you..."

**Write short sentences to aid comprehension.** Put one main thought in most sentences. Divide a long sentence into two or three short sentences. Remove all unnecessary words. If there are several conditions or subordinate provisions, make a list.

**Omit surplus words and redundancies.** Question the need for every word.

Don't Say	Say	Redundancies
for the period of	for	true and correct
in order to	to	cease and desist
in the event that	if	order and direct

**Place words carefully to reduce ambiguity.** Keep subjects and objects close to verbs. Put modifying phrases and words such as "only" and "always" next to the word they modify. She *only* said that he hired her. She said that *only* he hired her. She said that he hired *only* her.

**Be consistent.** Don't use different words to refer to the same thing (car, vehicle, automobile).

**Limit your use of abbreviations, acronyms, and capital letters.** Use abbreviations and acronyms to refer only to terms that are central to the document. Do not abbreviate terms that you use only a few times. Use capital letters to begin sentences, proper names, and titles and for headings. You should reconsider all other uses.

**Visit the government's plain language web site at [www.plainlanguage.gov](http://www.plainlanguage.gov).**



November 19, 2004

Jamie L. Paulin  
US EPA Region 5  
77 West Jackson Blvd. (DE-9J)  
Chicago, IL 60604

Dear Ms. Paulin,

In the interest of the ADR process and based on the recommendation of Judge Moran, we are offering a proposed baseline penalty adjustment. The proposed penalty offer is for establishing a new baseline, on which a reduction for the SEP will be factored. Our basis for this adjustment is detailed below.

*Count 1:* While Rollprint believes that seriousness of this violation is more appropriately rated minor harm/moderate deviation, for purposes of resolving this issue Rollprint will concede for Count 1 the seriousness of the violation being moderate/moderate. However, in assessing the penalty, several items need to be considered:

- All containers were located in closed flammable liquid storage cabinets with secondary containment. This significantly reduces the potential for harm.
- Most of the containers are located in Permanent Total Enclosures (PTEs). Any vapors escaping from the drums (and the secondary containment) are vented to a control device that destroys at least 95% of these vapors.
- Based upon the types of materials used, the potential harm to the environment and human health is minimal.
- Rollprint has been working diligently to comply with the requirement, based on evidence that most of the drums were closed on the follow-up inspection.
- No feedback was provided by the first inspector.

As a result, the penalty should be assessed at the low end of the penalty range, i.e., \$5500. Rollprint does not believe that the multiple violation factor of two is appropriate.

*Count 2:* Rollprint suggests changing the seriousness of the violation to moderate/minor for Count 2 and a penalty amount of \$3300.

- The inspector's report was false and misleading. The events and their sequence as described in the Complaint and Compliance Order are incorrect. In addition, no material spilled onto the floor (Please note that the products we use in the Egan Extruder Laminator are clear and

320 S. Stewart Avenue Addison, Illinois 60101-3310  
Phone: 630.628.1700 Fax: 630.628.8510  
[www.rollprint.com](http://www.rollprint.com)

Rollprint, Pactiv & Acme – Global Strategic Partners



would not show up in a picture. The black marks on the floor are scuff marks from the black satellite accumulation drums.)

- The satellite accumulation drums are kept in flammable liquid storage cabinets. These cabinets are recessed ensuring containment of any spill. The cabinets were put in place at the suggestion of the Addison Fire in order to minimize the potential of fire, explosion or release to the environment.

*Counts 3 and 4:* As previously discussed, we propose combining counts 3 and 4 and dropping the multiple violation factor of two.

- Rollprint continues to argue that the contingency plan, once established for the entire facility, takes precedence over the posting of required information.
- As facility B is at times a large quantity generator, a contingency plan is appropriate. Were we solely to follow EPA guidance, we would have a much more serious violation in those months were we are a large quantity generator.
- Rollprint would also like EPA to acknowledge that there was no communication between EPA and Rollprint regarding potential violations from either inspection. Once EPA communicated their position on these issues, the information was promptly posted. However, Rollprint emphatically states that this position was not specifically communicated to Rollprint until after we received the §3007 information request.

For purposes of resolving this issue, Rollprint will concede the seriousness of the violation, but suggest that the penalty be adjusted downward to \$550.

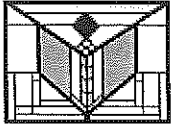
*Count 5:* Rollprint will concede for Count 5 the seriousness of the violation being minor/major. However, Rollprint continues to argue that this constitutes being penalized twice for the same violation. Rollprint suggests that the actual penalty assessed be at the low end of the range, which is \$1650, based on the fact that the seriousness of the above violations does not warrant a substantial penalty.

Rollprint reiterates that the nature of this letter is for discussion under the ADR process, and does not constitute Rollprint's position should this matter go to court. Based on the above information and the penalty adjustment of the individual counts, the baseline penalty proposed is \$11,000.

Please let us know if you would like to discuss this further.

Sincerely,

Mark E. Pederson  
Environmental, Health & Safety Manager  
Rollprint Packaging Products, Inc.



Bob Newport/R5/USEPA/US

11/05/2004 05:20 PM

To Jamie Paulin/R5/USEPA/US@EPA

Michael Berman/R5/USEPA/US@EPA, Phil  
cc Kaplan/R5/USEPA/US@EPA, Tinka  
Hyde/R5/USEPA/US@EPA

bcc

Subject Re: EMS SEP proposal and cost documentation.

Hi Jamie

You will want to see input you receive from Phil and Tinka, but here are my comments:

Basically I think the commitments described in narrative form in the SEP proposal are good. I particularly like the fact they will engage a 3rd party auditor and a copy of the audit report will be provided to EPA.

There are a couple things they could do to strengthen the description of what they will do.

- Number 4., Environmental Requirements, could be strengthened to say the facility will not only identify the applicable requirements, but they will make sure there is a process or mechanism through which they will ensure compliance with the requirement. The proposal says they will identify requirements and communicate environmental requirements to affected organization personnel. They could strengthen this, for example, by adding something like, "the facility will determine what plant process, activities, or persons are affected by/subject to each requirement identified, and will ensure that: (a) Operating procedures (and/or equipment settings, if appropriate) have incorporated mechanisms to ensure compliance (i.e., means of ensuring compliance are "built into" the day-to-day procedures and processes); and (b) Activities that occur on a schedule (e.g., submit a required report by January 15 of each year, inspect storm water BMPs in outside areas where materials are stored every 2 weeks) will be placed into a calendar system so that a reminder is provided when the action is coming due. That may be too nit-picky to say at this point, but when the EMS is submitted for our review we could look to see if they have "institutionalized" compliance into their plant operations, or if they will just identify and communicate the requirements.

- It is good that the EMS calls for establishment of procedures for investigation and prompt correction of potential violations, that the investigation processes will include root-cause analysis of identified problems to aid in developing the corrective actions, and that there will be identification and tracking of corrective and preventive actions. It could be better if in number 5., Assessment, Prevention, and Control, the EMS would say more specifically the facility will self-check for compliance with applicable requirements and to ensure SOPs developed under the EMS are being implemented. The write-up sort of says that, but it is fairly vague. Again, this may be too nit-picky to say at this point; you could wait for the EMS to be submitted and see what kind of self-checking they have laid out.

- Another section that is vague is Section 8., Environmental Planning and Organizational Decision-Making. In an ISO 14001 EMS, a facility would systematically identify its

environmental aspects (techno-speak for ways the facility impacts the environment), identify priority environmental aspects, and plan objectives and targets to make improvements relative to the priority environmental aspects. Rollprint does not really say that in their plan for an EMS. They just say they will, "Describe how environment planning will be integrated into organization decision-making, including plans and decisions on capital improvements, product and process design, training programs, and maintenance activities." The write-up does say they will establish "written targets, objectives, and action plans by at least each operating organizational subunit with environmental responsibilities, as appropriate, including those for contractor operations conducted at the facility, and how specified actions will be tracked and progress reported. Targets and objectives must include achieving and maintaining compliance with all environmental regulations." So that's good. But the context for the "written targets, objectives, and action plans" is not established. Theoretically they could say, "we have a target of making this widget 10% more efficiently, and we will stay in compliance as we do that" and that would conform to the language in their proposal. But that is not what EPA would like to see in terms of "targets, objectives, and action plans."

So those are my comments on the contents of the SEP proposal. With regard to the costs, I would say the costs they have laid out are in the ballpark (nothing too wildly overstated there). The estimate that annually, the EMS coordinator will devote 400 hours @ \$75/hr to maintaining, updating and internal auditing of the system may be a little high (once the system is up and running). But they sort of underestimate the true cost of EMS implementation in terms of the workers in the facility. If they really do a good job writing up new procedures to ensure compliance and prevent incidents, lots of things that will be worked into people's day-to-day duties will more effectively help ensure compliance and prevent problems. So I am fairly comfortable with the numbers in the cost breakdown.

Hope this helps. If you have questions about any of the above, please let me know.

Bob Newport  
886-1513  
Jamie Paulin/R5/USEPA/US

Jamie Paulin/R5/USEPA/US To

11/05/2004 03:46 PM

Subject EMS SEP proposal and cost documentation.

Hello all!

We are in the process of settling a case with a small business who proposed an EMS as their SEP and we don't have that much experience with the details of an EMS.

I just talked to Bob and he suggested that I send the EMS proposal and cost documentation for his and Phil's review to see if the proposal includes everything that an EMS requires. Just as an FYI, the facility will be doing the EMS internally and not hiring an outside contractor to perform the implementation or work.

I have attached the facility's proposal and cost breakdown for your review. Please let us know if you think this might meet US EPA acceptance.



Thank you so much for your help! I greatly appreciate it!  
(The documents need to be opened in View.)

Jamie



SEP Proposal.doc



Cost Breakdown of SEP Proposal.doc

---

Jamie L. Paulin

Chemist

U.S. Environmental Protection Agency, Region 5

Waste, Pesticides, Toxics Division

Enforcement and Compliance Assurance Branch

77 West Jackson Blvd.

Chicago, IL 60604-3590

phone: 312-886-1771

fax: 312-353-4342





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

Mail Code 1900L

October 29, 2004

Chief  
Administrative Law Judge

Michael E. Berman, Esquire  
Associate Regional Counsel  
U.S. EPA  
77 West Jackson Boulevard, C-14J  
Chicago, IL 60604-3590

Re: Rollprint Packaging Products, Inc.  
Docket No. RCRA-05-2004-0018

Dear Mr. Berman:

This Office, the Office of Administrative Law Judges, offers an Alternative Dispute Resolution (ADR) process to facilitate the settlement of cases. Please inform my legal staff assistant, Maria Whiting-Beale by **November 12, 2004**, as directed below, whether you accept or decline this offer to participate in ADR in an effort to settle the above cited case. The ADR process will be conducted pursuant to the Dispute Resolution Act of 1990, 5 U.S.C. §§ 571-583, by a Judge of this Office serving as a neutral. The process will be entirely voluntary and completely confidential; both these points, together with general procedures, are reviewed below.

Voluntary ADR will be used in a case only if both EPA and Respondent accept ADR; the choice to use or not to use ADR does not prejudice either party. If ADR is utilized, either party may terminate the ADR process at any time.

Confidential The ADR process will be conducted in a confidential manner, in accord with Section 584 of the Dispute Resolution Act of 1990. The Judge who serves as the neutral will not disclose to anyone the contents of any of the parties' ADR communications.

Procedures A Judge in this Office will serve as a neutral mediator. The ADR Judge will ordinarily begin by arranging a telephone conference with the parties to establish procedures. The specific role the ADR Judge will play will be determined after consultation with the parties. This Office has access to videoconferencing equipment and, with the consent of the parties, where deemed appropriate, the neutral may employ such equipment in the ADR process.



Authorization to Commit For the ADR process to be effective, the persons communicating with the neutral must either have authority to commit his or her side to a settlement, or have ready access to somebody with such authority.

Duration Unless terminated earlier by either party, the ADR process will continue for 60 days from the date of the case assignment to the ADR Judge; after that time, if no settlement has been reached, the case will be assigned to another Judge to commence the litigation process.

Follow Up At the termination of the ADR process, I will send the parties a questionnaire to elicit their views and experience with the process. The contents of individual questionnaires will be kept confidential and will be made available to the neutrals and others only in a composite format.

Again, please inform Maria Whiting-Beale by **November 12, 2004**, whether you accept or decline the ADR process that I have described. It is preferred that you inform Ms. Whiting-Beale by e-mail at: Whiting-Beale.Maria@epa.gov or by letter sent via facsimile to (202) 565-0044. However, you may inform her by calling this Office, (202) 564-6271, and leaving a message for her, or by letter *received in this Office on or before the due date*. The mailing address **if sent by mail is**: U.S. EPA, Office of Administrative Law Judges, Mail Code 1900L, 1200 Pennsylvania Avenue, NW, Washington, DC 20460-2001. **For hand-delivery by Federal Express or another delivery service** which x-rays packages as a routine security procedure, the address is: U.S. EPA, Office of Administrative Law Judges, 1099 14<sup>th</sup> Street, N.W., Suite 350, Washington, DC 20005.

Your e-mail, fax, letter or phone message must state: (1) your name, (2) the name of the party you represent, (3) the name(s) of the respondent(s) named in the complaint, (4) the docket number, and (5) whether you want ADR or do not want ADR. You may also inform Ms. Whiting-Beale as to whether another party in the case accepts or declines ADR, if that party has requested that you convey that information on that party's behalf. In that event, your e-mail, fax letter or phone message must state, in addition: (1) the name and telephone number of the person who requested you to convey the message, (2) the name of the party represented by that person, and (3) whether that party wants ADR or does not want ADR.

If you have another party in the case convey a message that you want ADR, then you should confirm, on or before the due date stated herein, that this Office has received the message.

If no response is received in this Office by the deadline from you or another party on your behalf, it will be assumed that you **do not** wish to participate in ADR and the case will be assigned immediately to a Judge for litigation. **Absolutely no extension of the deadline for deciding whether you wish to participate in ADR will be granted.** However, the

ADR described above may be available later in the litigation process upon joint motion of all parties to initiate ADR, granted at the sole discretion of the presiding litigation Judge.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'S. Biro', with a stylized, cursive flourish at the end.

Susan L. Biro  
Chief Administrative Law Judge

cc: Mark E. Pederson, Environmental, Health & Safety Manager  
Sonja Brooks-Woodard, Regional Hearing Clerk



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

October 26, 2004

REPLY TO THE ATTENTION OF:

Honorable Susan L. Biro, Chief ALJ  
Office of Administrative Law Judges  
U. S. Environmental Protection Agency  
Ariel Rios Building, Mailcode: 1900L  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

E-19J

RE:	In The Matter of:	<b>Rollprint Packaging Products, Inc.</b>
	Docket No:	<b>RCRA-05-2004-0018</b>
	Complaint:	<b>September 29, 2004</b>
	Total Proposed Penalty:	<b>\$27,665.00</b>

Dear Judge Biro:

Enclosed, please find a copy of **Rollprint Packaging Products, Inc.'s** Administrative Complaint, Respondent's Answer to Administrative Complaint and Request for Hearing.

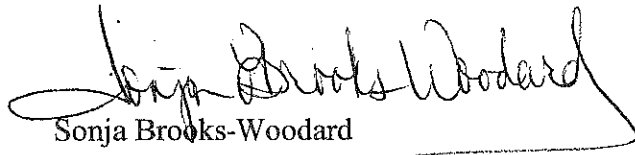
As a result of the Respondent's Response to the Administrative Complaint and Request for Hearing, I am requesting an Administrative Law Judge be assigned to conduct the Hearing.

Please advise me as to what Judge is being assigned.

Should you have any questions or need any additional information, please contact me at 312-886-3617.

Thank you.

Respectfully,

  
Sonja Brooks-Woodard  
Regional Hearing Clerk

Enclosures

cc: **Mark E. Pederson, Esquire**  
**Rollprint Packaging Products, Inc.**  
**320 Stewart Avenue**  
**Addison, Illinois 60101-3310**  
**(630) 628-1700**

**Michael R. Berman, Esquire**  
**Associate Regional Counsel**  
**Office Regional Counsel**  
**U.S. EPA -- Region 5**  
**77 West Jackson Blvd., C-14J**  
**Chicago, Illinois 60604-3590**  
**(312) 886-6837**



October 25, 2004

Regional Hearing Clerk (R-19J)  
U.S. EPA Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604

Re: Administrative Complaint RCRA-05-2004 - 0018

To Whom It May Concern:

Rollprint Packaging Products, Inc. is filing this response in reference to the above mentioned Administrative Complaint. Rollprint is requesting a hearing in part to dispute the alleged violations and the excessive penalty imposed on Rollprint.

In reviewing the counts, it should be noted that there are several factual errors in the US EPA's inspection report. While many are not material to the counts and are, as a result, not addressed in this response, this should put into doubt the inspector's ability to ascertain the facts of the case.

It should also be noted that on the October 30, 2002 inspection, no closing meeting occurred, and no feedback provided by the inspector in regards to areas of concern and/or violations of the requirements. There were issues raised by the Rollprint representative during the inspection, which the inspector promised to respond back to the company in a short period of time. Rollprint never heard from the EPA inspector, nor any representative of EPA, until the second visit on July 14, 2003. As stated in paragraph 32, this was a follow-up visit to determine if any changes were made. Rollprint will argue that had the company known what all the issues of concern were, these would have been resolved long before the second inspection.

Rollprint's defense of the alleged violations is as follows:

Count 1: Rollprint neither admits nor denies that it failed to comply with 35 IAC § 722.134(c)(1)(A) [40 C.F.R. § 262.34(c)(1)(i)] such that several drums were open in the satellite accumulation area upon discovery during US EPA's October 30, 2002 inspection. It should be noted that all containers were located in closed flammable liquid storage cabinets with secondary containment. During US EPA's inspection on July 14, 2003, only one container was found to be open in the closed storage cabinet, which is located in the satellite accumulation area. Rollprint feels that the company was working diligently to assure that all primary containers remained closed. The fact that containers that were found open during the first



inspection were found closed on the second inspection, gives credence to  
— this fact.  
—

In regards to the penalty amount, Rollprint argues against the seriousness of the violation and the doubling of the penalty imposed. Rollprint argues that the penalty should be assessed as a minor harm/moderate deviation, since the harm to the environment-human health was not serious based on the types of materials used in the facility.

In addition, most of the containers are located in Permanent Total Enclosures (PTEs), where the vapors escaping from the drums are vented to a control device that meets or exceeds 95% destruction of those vapors. The PTE's conform to the requirements of EPA's Method 204 and Rollprint will provide the verification results as evidence of this fact.

In regards to the doubling of the penalty, again Rollprint argues that it has worked diligently to assure all primary containers are closed when not adding or removing waste, and should be given credit for doing so. This was occurring in spite of the fact that no feedback was provided from EPA regarding their concerns.

Count 2: Rollprint denies that the company failed to comply with 35 IAC § 725.131 [40 C.F.R. § 265.31] which requires a company to minimize the possibility of fire, explosion or release which could threaten human health or the environment. The inspector was accompanied by a representative of the company, who argues that the facts presented in this count are false and misleading.

As the inspector approached the area where the satellite container was located, an employee of Rollprint was in the process of adding waste to the 55 gallon container. In no circumstance did the inspector have the opportunity to observe solidified material inside the funnel prior to this action. Although he did observe the overflow of the material, the material was contained in the flammable storage cabinet, and not released onto the floor. Upon release of the material, the employee removed the material that was blocking the funnel, and continued pouring the waste into the drum. The inspector, after observing this, walked away from the area, only to return some time later. He did not observe the addition of another 55 gallon container being added to the same 55 gallon drum.

Rollprint has in place flammable liquid storage cabinets which contain the satellite accumulation drums. These cabinets are kept closed at all times, when not adding or removing hazardous waste and are marked with the words "Hazardous Waste" on the doors. In addition, all containers stored in the less than 90-day storage area are individually labeled. These

cabinets were put in place at the request of the Addison Fire Department, in order to assure that Rollprint takes every precaution to minimize hazards associated with its operations. These cabinets are recessed such that any spillage is contained inside the cabinet, and not released into the environment. Pictures taken by the inspector clearly show the recessed area of the cabinets, and other pictures will be provided as evidence that material was not released onto the floor.

In light of the information provided above, Rollprint is arguing against the excessiveness of the penalty imposed. The penalty should be assessed as a minor harm/major deviation, resulting in a penalty amount of \$1,100. Although spills should be avoided as much as possible, it is the minimization of the amount spilled and the containment of these spills that should be considered in assessing any penalty, if warranted. Rollprint has continually worked with the Addison Fire Department in minimizing the potential for fires, explosions and releases. It was at the suggestion of the fire department to locate all of its flammable chemicals that are being either dispensed from or materials added to drums, be located in approved flammable liquid storage cabinets. Rollprint has also worked diligently with the fire department on the location of fire extinguishers and its sprinkler system, to assure that should a fire occur, its effects would be minimal

Count 3: Rollprint denies that it failed to comply with 35 IAC § 722.134(d)(5)(B)(i) [40 C.F.R. §262.34(d)(5)(ii)(A)], as the company has in place a Hazardous Waste Contingency Plan for all of its operations. First and foremost, Rollprint does not distinguish Facility A and Facility B as two separate entities, even though they are defined as two companies under the definition of a hazardous waste generator. Second, Rollprint's employees are not stationed in one facility or the other; they are moved from one facility to the other based on production demand and needs. As a result of this movement, they need to be aware of the operations in both facilities.

The requirements of 35 IAC § 722.134(d)(5)(B)(i) apply to facilities that are classified as small quantity generators. Although Rollprint's 335 building (Facility B) is considered a small quantity generator for long periods of time, the facility has exceeded the 1000 kilograms requirement a couple of times. For those months, Facility B has had to comply with the large quantity generator requirements, including filing a Hazardous Waste Generator Report.

Because Facility B has the capability of becoming a large quantity generator, although on an infrequent basis, the facility has taken the position to comply with the large quantity generator standards for preparedness by referring to the contingency plan. All employees directly

involved with the generation of hazardous waste are fully aware and trained on the contingency plan. The contingency plan meets the content requirements such that it has all the emergency response phone numbers, including the phone number of the emergency coordinator. The contingency plan will be provided as evidence.

It should be noted the 10/30/02 inspector provided no feedback that compliance with the more stringent large quantity generator requirements was not acceptable to US EPA.

Count 4: Rollprint denies that it failed to comply with 35 IAC § 722.134(d)(5)(B)(ii) [40 C.F.R. §262.34(d)(5)(ii)(B)], as the company has in place a Hazardous Waste Contingency Plan for all of its operations. First and foremost, Rollprint does not distinguish Facility A and Facility B as two separate entities, even though they are defined as two companies under the definition of a hazardous waste generator. Second, Rollprint's employees are not stationed in one facility or the other; they are moved from one facility to the other based on production demand and needs. As a result of this movement, they need to be aware of the operations in both facilities.

The requirements of 35 IAC § 722.134(d)(5)(B)(i) apply to facilities that are classified as small quantity generators. Although Rollprint's 335 building (Facility B) is considered a small quantity generator for long periods of time, the facility has exceeded the 1000 kilograms requirement a couple of times. For those months, Facility B has had to comply with the large quantity generator requirements, including filing a Hazardous Waste Generator Report.

Because Facility B has the capability of becoming a large quantity generator, although on an infrequent basis, the facility has taken the position to comply with the large quantity generator standards for preparedness by referring to the contingency plan. All employees directly involved with the generation of hazardous waste are fully aware and trained on the contingency plan. The contingency plan meets the content requirements such that it has a map of the facility which identifies the location of all fire extinguishers, spill control equipment, eye wash stations, and exits. The contingency plan will be provided as evidence.

It should be noted the 10/30/02 inspector provided no feedback that compliance with the more stringent large quantity generator requirements was not acceptable to US EPA.

Count 5: Rollprint denies the company failed to comply with 35 IAC §§ 702.120, 702.123, 703.150(a), 703.180 and 703.181 [40 C.F.R. §§ 270.10(a), (d)

U.S. EPA Region 5  
October 25, 2004

and (e); and 270.13] by failing to apply for a hazardous waste storage permit. Rollprint emphatically argues against this count as it constitutes being penalized for the same violations twice. U.S. EPA is alleging that Rollprint failed to comply with conditions for an exemption from the permit requirements (Counts 1-4), assesses a penalty on those deviations, and then penalizes the company again for those permit exemptions. This count should be dropped from the complaint in its entirety, or be the only alleged count in the complaint.

Rollprint continues to work with US EPA on settling this complaint, but is again requesting a hearing of the allegations in case the settlement talks are discontinued. We look forward to a response based on the arguments set forth above.

Sincerely

A handwritten signature in cursive script, appearing to read "Mark E. Pederson".

Mark E. Pederson  
Environmental, Health & Safety Manager

cc: Dhuanne Dodrill, President and COO  
Michael Berman, US EPA





October 21, 2004

Jamie Paulin  
U.S. EPA  
77 West Jackson Boulevard, DE-9J  
Chicago, IL 60604-3590

Re: SEP Proposal

Dear Jamie

Enclosed is Rollprint Packaging Products, Inc. Supplemental Environmental Project (SEP) Proposal. The proposal put forth by Rollprint is to establish an Environmental Management System (EMS) within the Company's facility located in Addison, IL. The SEP is being proposed as part of a settlement with US EPA Region V regarding hazardous waste violations.

Rollprint believes that the EMS is in compliance with US EPA's policy on SEP's, in that the project will reduce the potential for future violations. The EMS is known to provide enhanced compliance with environmental regulations and is a tool available to small businesses for settlement purposes. In addition to the project's applicability in meeting the policy, the EMS is not statutorily required and Rollprint is implementing the EMS on its own.

If you have any additional questions, please call me at (630) 628-1700.

Sincerely

Mark E. Pederson  
Environmental, Health & Safety Manager

cc: Dhuanne Dodrill, President & COO w/o Attachment

encl.

ROLLPRINT PACKAGING PRODUCTS, INC.  
ENVIRONMENTAL MANAGEMENT SYSTEM

A. Objectives. Rollprint Packaging Products, Inc. (Rollprint) will develop, implement and maintain an Environmental Management System (EMS) at the following facility, 320 S Stewart Avenue, Addison, Illinois.

Note: The 320 S Stewart Avenue facility includes operations in the 320, 335A, 335B, 340, and 345 buildings.

B. Project Description. The EMS Manual shall describe respective management systems, subsystems, and tasks for the following elements:

1. Environmental Policy

- Inputs*  
*EMS → output*  
*What do you think?*
- a) This policy, upon which the EMS is based, will clearly communicate management commitment to achieving compliance with applicable federal, state, and local environmental statutes, enforceable agreements, and permits and continuous improvement in environmental performance. The policy will also state management's intent to provide adequate personnel and other resources for the EMS.

2. Organization, Personnel, and Oversight of EMS

- This is -*  
*costs anywhere*  
*from the ballpark*
- a) Describes, organizationally, how the EMS is implemented and maintained.
- b) Includes organization charts that identify units, line management, and other individuals having environmental performance and regulatory compliance responsibilities.
- c) Identifies and defines duties, roles, responsibilities, and authorities of key environmental program personnel in implementing and sustaining the EMS.
- d) Includes ongoing means of communicating environmental issues and information to all organization personnel, on-site service providers, and contractors, and for receiving and addressing concerns.

*Break down -*  
*EMS guys*

3. Accountability and Responsibility

- a) Specifies accountability and responsibilities of organization's management, on-site service providers, and contractors for environmental protection practices, assuring compliance, required reporting to regulatory agencies, and corrective actions implemented in their area(s) of responsibilities.

- b) Describes potential consequences for departure from specified operating procedures, including liability for civil/administrative penalties imposed as a result of noncompliance.

#### 4. Environmental Requirements

- a) Describes process for identifying, interpreting, and effectively communicating environmental requirements to affected organization personnel, on-site service providers, and contractors, and ensuring that facility activities conform to those requirements. Specifies procedures for prospectively identifying and obtaining information about changes and proposed changes in environmental requirements, and incorporating those changes into the EMS.
- b) Establishes and describes processes to ensure communication with regulatory agencies regarding environmental requirements and regulatory compliance.

#### 5. Assessment, Prevention, and Control

- a) Identifies an ongoing process for assessing operations, for the purposes of preventing and controlling releases, ensuring environmental protection, and maintaining compliance with statutory and regulatory requirements. This section shall describe monitoring and measurements, as appropriate, to ensure sustained compliance. It shall also include identifying operations, and waste streams where equipment malfunctions and deterioration, operator errors, and discharges or emissions may be causing, or may lead to: (1) releases of hazardous waste or other pollutants to the environment, (2) a threat to human health or the environment, or (3) violations of environmental requirements.
- b) Describes process for identifying operations and activities where documented standard operating practices (SOP's) are needed to prevent potential violations or pollutant releases, and defines a uniform process for developing, approving and implementing the SOP's.
- c) Describes a system for conducting and documenting routine, objective, self-inspections by department supervisors and trained staff.
- d) Describes process for ensuring input of environmental requirements (or concerns) in planning, design, and

operation of ongoing, new, and/or changing buildings, processes, maintenance activities, and products.

6. Environmental Incident and Noncompliance Investigations

- a) Describes standard procedures and requirements for internal and external reporting of potential violations and release incidents.
- b) Establishes procedures for investigation, and prompt and appropriate correction of potential violations. The investigation process includes root-cause analysis or identified problems to aid in developing the corrective actions.
- c) Describes a system for development, tracking, and effectiveness verification of corrective and preventive actions.
- d) Each of these procedures shall specify self-testing of such procedures, where practicable.

7. Environmental Training, Awareness, and Competence

- a) Identifies specific education and training required for organization personnel, as well as process for documenting training provided.
- b) Describes program to ensure that organization employees are aware of its environmental policies and procedures, environmental requirements, and their roles and responsibilities within the environmental management system.
- c) Describes program for ensuring that personnel responsible for meeting and maintaining compliance with environmental requirements are competent on the basis of appropriate education, training, and/or experience.

8. Environmental Planning and Organizational Decision-Making

- a) Describes how environment planning will be integrated into organization decision-making, including plans and decisions on capital improvements, product and process design, training programs, and maintenance activities.
- b) Requires establishing written targets, objectives, and action plans by at least each operating organizational subunit with environmental responsibilities, as appropriate, including those for contractor operations conducted at the facility, and how specified actions will be tracked and progress reported. Targets and objectives must include achieving



and maintaining compliance with all environmental regulations.

9. Maintenance of Records and Documentation

- a) Identifies the types of records developed in support of the EMS (including audits and reviews), who maintains them and where, and protocols for responding to inquiries and requests for release of information.
- b) Specifies the data management system for any internal waste tracking, environmental data, and hazardous waste determinations.

10. Pollution Prevention Program

- a) Describes an internal program for preventing, reducing, recycling, reusing, and minimizing waste and emissions, including procedures to encourage material substitutions. Also includes mechanisms for identifying candidate materials to be addressed by program and tracking progress.

11. Continuing Program Evaluation and Improvement

- a) Describes program for periodic (at least annually) evaluation of the EMS, including incorporating the results of the assessment into program improvements, revisions to the manual, and communicating findings and action plans to affected employees, on-site service providers, and contractors.
- b) Describes a program for ongoing evaluation of facility compliance with environmental requirements, and should specify periodic compliance audits by an independent auditor(s). Audit results are reported to upper management and potential violations are addressed through the process described in element 6 above.

C. Project Schedule

- 1. Within two hundred seventy (270) days of the effective date of the Consent Agreement and Final Order, Rollprint shall complete the preparation of the Environmental Management System Manual which shall describe and document the comprehensive EMS and contain an EMS implementation schedule for each of the describe systems and subsystems.

2. Rollprint shall submit the entire Environmental Management System manual to U.S. EPA for review and comment within thirty (30) days of its completion.
3. U.S. EPA will provide comments on the Environmental Management System manual within ninety (90) days of receipt unless notified in writing additional time for review is required.
4. Within thirty (30) days of receipt of EPA's comments, a written response, as appropriate, addressing EPA's comments will be provided.
5. Upon receipt of EPA's comments, Rollprint shall immediately commence implementation of the EMS in accordance with the schedule contained in the EMS Manual. Rollprint shall submit implementation status reports to EPA on a quarterly basis, beginning not earlier than sixty (60) days from receipt of EPA's comments. The status reports shall be due on the 15<sup>th</sup> day of the reporting month and every quarter thereafter, until implementation is complete.
6. Within twelve (12) months of completion and implementation of the EMS, Rollprint shall contract with an appropriate EMS Auditor to evaluate the adequacy of EMS implementation. A draft EMS Audit Plan shall be prepared and submitted to EPA for review and comment.
7. Within thirty (30) days of receipt of EPA's comments on the draft EMS Audit Plan, a final Audit Plan shall be developed incorporating those comments. The audit shall be completed within sixty (60) days of submission of the final EMS Audit Plan.
8. The Auditor shall develop and submit the Audit Report to Rollprint and EPA, within sixty (60) days following the completion of the on-site portion of the audit. The Audit Report shall present the Audit Findings and shall, at a minimum, contain the following information:
  - Audit scope, including the period of time covered by the audit;
  - The date(s) the on-site portion of the audit was conducted;
  - Identification of audit team members;
  - Identification of Rollprint representatives observing the audit;
  - The distribution of the EMS Audit Report
  - A summary of the audit process, including any obstacles encountered;
  - Detailed Audit Findings, including the basis for each finding and each Area of Concern identified;
  - Identification of any Audit Findings corrected or Areas of Concern addressed during the audit, and a description of the corrective measures and when they were implemented; and,

- Certification by the Consultant Auditor that the EMS audit was conducted in accordance with the provision of the CAFO.
9. Within sixty (60) days of receiving the Audit Report, Rollprint shall develop and submit to EPA for review and comment, an Action Plan for expeditiously bringing the Facility into full conformance with the EMS provisions in the CAFO and the EMS Manual, and fully address all Areas of concern. The Action Plan shall include and implementation schedule, if needed.
  10. Within thirty (30) days of receipt of the Action Plan, EPA shall provide written comments to Rollprint.
  11. Rollprint shall implement the Action Plan in accordance with the schedules set forth therein, incorporation any necessary modifications based on EPA's comments.
  12. Within thirty (30) days or after all items or activities in the Action Plan have been completed, Rollprint shall submit a written Action Plan Completion Certification to EPA, signed by the President.

D. Cost Estimate

1. Development of Environmental Management System procedures, documents, and forms. Development includes cost of training on Environmental Management Systems, and review of the procedures, documents, and forms by internal management responsible for implementation of EMS. (Based on ballpark quotes)  
\$50,000
2. Implementation of EMS, including training of all affected employees. (Based on ballpark quotes)  
\$25,000
3. Audit of EMS system by a certified consultant, including any revisions/modifications that may be necessary. (Based on ballpark quotes)  
\$5,000
3. Annual cost of EMS after full implementation, which includes continuous updating of system procedures, documents and forms, annual training and internal audit of system. (Based on ballpark quotes)  
\$20,000



September 3, 2004

Jamie L. Paulin  
US EPA Region 5  
77 West Jackson Blvd. (DE-9J)  
Chicago, IL 60604

Dear Ms. Paulin,

The settlement offer is as follows: Rollprint Packaging Products will implement an Environmental Management System as a SEP and offer a penalty payment of \$1050. The cost of implementing and maintaining EMS and the environmental benefits, far exceeds the proposed penalty, and therefore warrants a significant penalty reduction.

I reiterate again that counts 5&6 should be dropped due to the fact that we had a contingency plan in place, and that all employees are advised and trained on that plan. If a small quantity generator wanted to comply with the large quantity generator regulations, which are more burdensome and protective, EPA would not seek penalties from that company.

With regards to counts 3&4, we again argue that potential for harm is minimal. The drums are stored in cabinets that are closed at all times, except when filling or changing out full drums. The fact that the doors were open for the inspector was so he can take the pictures. The cabinets were put in place years ago at the recommendation of the Addison Fire Department, in order to minimize the potential for releases and fire. We continue to work with the Fire Department to minimize these potential hazards throughout our facility, and providing the proper equipment to address incidents if they were to occur.

We feel this is an appropriate settlement based on the fact that we are willing to settle, and the facts of the case don't merit as large a penalty as proposed. We also believe that the settlement follows the guidelines of the penalty policy, is in line with case settlement history, and recognizes the fact that we are a small business and these are first time violations. The last two points are substantial arguments that we have raised in the past and feel you have not considered in the settlement negotiations.

Mike's explanation for the low settlement figures for the three cases brought to your attention by Rollprint did not go far enough in convincing us that we should be treated differently. Settling a multi-day penalty proposal to just one day, due to the threat of litigation certainly does not comply with your penalty policy.



320 S. Stewart Avenue Addison, Illinois 60101  
Phone: 630.628.1700 Fax: 630.628.8510  
[www.rollprint.com](http://www.rollprint.com)

**DHUANNE DODRILL**  
President

Rollprint, Pactiv & Acme - Global Strategic Pa

320 S. Stewart Avenue Addison, Illinois 60101-3310  
Phone: 630.628.1700 x3208 Fax: 630.628.8957 Email: [dhuanne@rollprint.com](mailto:dhuanne@rollprint.com)  
[www.rollprint.com](http://www.rollprint.com)



The other case, regarding the small vs. large quantity generator penalty, again shows the lack of knowledge of your inspector. As stated in our previous discussions, there are several factual errors in the inspector's report, and if we were to pursue litigation, this information will be brought forward. In addition, most of the findings of the inspector in the other case would still apply to a small quantity generator and would indicate more serious issues were present than those found at Rollprint.

Please let us know if you would like to discuss this further.

Sincerely,

Mark E. Pederson  
Environmental, Health & Safety Manager  
Rollprint Packaging Products, Inc.

⇒ Break down - SEP ⇒ by cost of what they → costs - subcontractors, what ROLLPRINT PACKAGING PRODUCTS, INC. ENVIRONMENTAL MANAGEMENT SYSTEM *They're doing what they are already supposed to do.*

A. Objectives. Rollprint Packaging Products, Inc. (Rollprint) will develop, implement and maintain an Environmental Management System (EMS) at the following facility, 320 S Stewart Avenue, Addison, Illinois.

Note: The 320 S Stewart Avenue facility includes operations in the 320, 335A, 335B, 340, and 345 buildings.

B. Project Description. The EMS Manual shall describe respective management systems, subsystems, and tasks for the following elements:

1. Environmental Policy

*excludes from - any - maintain - acquired SEP*

- a) This policy, upon which the EMS is based, will clearly communicate management commitment to achieving compliance with applicable federal, state, and local environmental statutes, enforceable agreements, and permits and continuous improvement in environmental performance. The policy will also state management's intent to provide adequate personnel and other resources for the EMS.

2. Organization, Personnel, and Oversight of EMS

- a) Describes, organizationally, how the EMS is implemented and maintained.
- b) Includes organization charts that identify units, line management, and other individuals having environmental performance and regulatory compliance responsibilities.
- c) Identifies and defines duties, roles, responsibilities, and authorities of key environmental program personnel in implementing and sustaining the EMS.
- d) Includes ongoing means of communicating environmental issues and information to all organization personnel, on-site service providers, and contractors, and for receiving and addressing concerns:

3. Accountability and Responsibility

- a) Specifies accountability and responsibilities of organization's management, on-site service providers, and contractors for environmental protection practices, assuring compliance, required reporting to regulatory agencies, and corrective actions implemented in their area(s) of responsibilities.

- b) Describes potential consequences for departure from specified operating procedures, including liability for civil/administrative penalties imposed as a result of noncompliance.

#### 4. Environmental Requirements

- a) Describes process for identifying, interpreting, and effectively communicating environmental requirements to affected organization personnel, on-site service providers, and contractors, and ensuring that facility activities conform to those requirements. Specifies procedures for prospectively identifying and obtaining information about changes and proposed changes in environmental requirements, and incorporating those changes into the EMS.
- b) Establishes and describes processes to ensure communication with regulatory agencies regarding environmental requirements and regulatory compliance.

#### 5. Assessment, Prevention, and Control

- a) Identifies an ongoing process for assessing operations, for the purposes of preventing and controlling releases, ensuring environmental protection, and maintaining compliance with statutory and regulatory requirements. This section shall describe monitoring and measurements, as appropriate, to ensure sustained compliance. It shall also include identifying operations, and waste streams where equipment malfunctions and deterioration, operator errors, and discharges or emissions may be causing, or may lead to: (1) releases of hazardous waste or other pollutants to the environment, (2) a threat to human health or the environment, or (3) violations of environmental requirements.
- b) Describes process for identifying operations and activities where documented standard operating practices (SOP's) are needed to prevent potential violations or pollutant releases, and defines a uniform process for developing, approving and implementing the SOP's.
- c) Describes a system for conducting and documenting routine, objective, self-inspections by department supervisors and trained staff.
- d) Describes process for ensuring input of environmental requirements (or concerns) in planning, design, and

operation of ongoing, new, and/or changing buildings, processes, maintenance activities, and products.

6. Environmental Incident and Noncompliance Investigations

- a) Describes standard procedures and requirements for internal and external reporting of potential violations and release incidents.
- b) Establishes procedures for investigation, and prompt and appropriate correction of potential violations. The investigation process includes root-cause analysis or identified problems to aid in developing the corrective actions.
- c) Describes a system for development, tracking, and effectiveness verification of corrective and preventive actions.
- d) Each of these procedures shall specify self-testing of such procedures, where practicable.

7. Environmental Training, Awareness, and Competence

- a) Identifies specific education and training required for organization personnel, as well as process for documenting training provided.
- b) Describes program to ensure that organization employees are aware of its environmental policies and procedures, environmental requirements, and their roles and responsibilities within the environmental management system.
- c) Describes program for ensuring that personnel responsible for meeting and maintaining compliance with environmental requirements are competent on the basis of appropriate education, training, and/or experience.

8. Environmental Planning and Organizational Decision-Making

- a) Describes how environment planning will be integrated into organization decision-making, including plans and decisions on capital improvements, product and process design, training programs, and maintenance activities.
- b) Requires establishing written targets, objectives, and action plans by at least each operating organizational subunit with environmental responsibilities, as appropriate, including those for contractor operations conducted at the facility, and how specified actions will be tracked and progress reported. Targets and objectives must include achieving



and maintaining compliance with all environmental regulations.

9. Maintenance of Records and Documentation

- a) Identifies the types of records developed in support of the EMS (including audits and reviews), who maintains them and where, and protocols for responding to inquiries and requests for release of information.
- b) Specifies the data management system for any internal waste tracking, environmental data, and hazardous waste determinations.

10. Pollution Prevention Program

- a) Describes an internal program for preventing, reducing, recycling, reusing, and minimizing waste and emissions, including procedures to encourage material substitutions. Also includes mechanisms for identifying candidate materials to be addressed by program and tracking progress.

11. Continuing Program Evaluation and Improvement

- a) Describes program for periodic (at least annually) evaluation of the EMS, including incorporating the results of the assessment into program improvements, revisions to the manual, and communicating findings and action plans to affected employees, on-site service providers, and contractors.
- b) Describes a program for ongoing evaluation of facility compliance with environmental requirements, and should specify periodic compliance audits by an independent auditor(s). Audit results are reported to upper management and potential violations are addressed through the process described in element 6 above.

C. Project Schedule

- 1. Within two hundred seventy (270) days of the effective date of the Consent Agreement and Final Order, Rollprint shall complete the preparation of the Environmental Management System Manual which shall describe and document the comprehensive EMS and contain an EMS implementation schedule for each of the describe systems and subsystems.

*270 days*

2. Rollprint shall submit the entire Environmental Management System manual to U.S. EPA for review and comment within thirty (30) days of its completion.
3. U.S. EPA will provide comments on the Environmental Management System manual within ninety (90) days of receipt unless notified in writing additional time for review is required.
4. Within thirty (30) days of receipt of EPA's comments, a written response, as appropriate, addressing EPA's comments will be provided.
5. Upon receipt of EPA's comments, Rollprint shall immediately commence implementation of the EMS in accordance with the schedule contained in the EMS Manual. Rollprint shall submit implementation status reports to EPA on a quarterly basis, beginning not earlier than sixty (60) days from receipt of EPA's comments. The status reports shall be due on the 15<sup>th</sup> day of the reporting month and every quarter thereafter, until implementation is complete.
6. Within twelve (12) months of completion and implementation of the EMS, Rollprint shall contract with an appropriate EMS Auditor to evaluate the adequacy of EMS implementation. A draft EMS Audit Plan shall be prepared and submitted to EPA for review and comment.
7. Within thirty (30) days of receipt of EPA's comments on the draft EMS Audit Plan, a final Audit Plan shall be developed incorporating those comments. The audit shall be completed within sixty (60) days of submission of the final EMS Audit Plan.
8. The Auditor shall develop and submit the Audit Report to Rollprint and EPA, within sixty (60) days following the completion of the on-site portion of the audit. The Audit Report shall present the Audit Findings and shall, at a minimum, contain the following information:
  - Audit scope, including the period of time covered by the audit;
  - The date(s) the on-site portion of the audit was conducted;
  - Identification of audit team members;
  - Identification of Rollprint representatives observing the audit;
  - The distribution of the EMS Audit Report
  - A summary of the audit process, including any obstacles encountered;
  - Detailed Audit Findings, including the basis for each finding and each Area of Concern identified;
  - Identification of any Audit Findings corrected or Areas of Concern addressed during the audit, and a description of the corrective measures and when they were implemented; and,

180  
15/5/01

- Certification by the Consultant Auditor that the EMS audit was conducted in accordance with the provision of the CAFO.
9. Within sixty (60) days of receiving the Audit Report, Rollprint shall develop and submit to EPA for review and comment, an Action Plan for expeditiously bringing the Facility into full conformance with the EMS provisions in the CAFO and the EMS Manual, and fully address all Areas of concern. The Action Plan shall include and implementation schedule, if needed.
  10. Within thirty (30) days of receipt of the Action Plan, EPA shall provide written comments to Rollprint.
  11. Rollprint shall implement the Action Plan in accordance with the schedules set forth therein, incorporation any necessary modifications based on EPA's comments.
  12. Within thirty (30) days or after all items or activities in the Action Plan have been completed, Rollprint shall submit a written Action Plan Completion Certification to EPA, signed by the President.

D. Cost Estimate

1. Development of Environmental Management System procedures, documents, and forms. Development includes cost of training on Environmental Management Systems, and review of the procedures, documents, and forms by internal management responsible for implementation of EMS. (Based on ballpark quotes)
 

\$50,000
2. Implementation of EMS, including training of all affected employees. (Based on ballpark quotes)
 

\$25,000
3. Audit of EMS system by a certified consultant, including any revisions/modifications that may be necessary. (Based on ballpark quotes)
 

\$5,000
3. Annual cost of EMS after full implementation, which includes continuous updating of system procedures, documents and forms, annual training and internal audit of system. (Based on ballpark quotes)
 

\$20,000

*Aug 27, 2005*

*480 days*

*Feb 23, 2006*

## Cost Breakdown of SEP Proposal

The original cost of the Environmental Management System proposed was an extremely conservative estimate that only accounted for the time spent by Rollprint's EH&S Manager in developing and supporting the EMS Program. Below is a breakdown of time and hourly costs associated with implementing the Environmental Management System.

A majority of the work will be completed by Mark Pederson, with support from senior management in the review of the procedures, forms and documents, to ensure that the system will meet the requirements.

Secretarial work will consist of formatting documents, collating, binding, and distributing the materials for review, signature, and training. This will also consist of maintenance of the system and updating the procedures, forms and documents, as needed.

Please note that this estimate does not account for the cost of lost manufacturing time as a result of training classes.

### 1. Development of Environmental Management System – 9 Months

1000 hours @ \$75/hr for the development of the procedures, documents and forms. This will include off-site training on implementation of an Environmental Management System

20 hours @ \$200/hr for management review of EMS procedures

100 hours @ \$25/hr for secretarial support

### 2. Implementation of Environmental Management System – 12 Months

140 hours @ \$75/hr for development of training materials and training 100 employees on the Environmental Management System.

100 employees trained for 6 hours @ \$40/hr

### 3. Audit of Environmental Management System By Outside Consultant – 2 Months

\$5000 - Cost is based on \$1200 per man-day for two people over 2 days. Reference for cost is Perry Johnson Registrars. The reference is for actual registration, which would actually take more than two days to complete.

### 4. Annual Operation of Environmental Management System

400 hours @ \$75/hr for maintaining, updating and internal auditing of the system

100 employees trained for 1 hour/year @ \$40/hr on Environmental Management System and updates that may occur during the course of the year.

10 hours @ \$200/hr for management support, review and auditing of the Environmental Management System

30 hours @ \$25/hr for secretarial support

Development  
1 hr -  
\$80,500

\$50-80,000  
\$40

\$75,000  
\$4,000  
\$1,250

\$10,500  
\$240

\$5,000

\$30,000

\$40  
\$12,000  
\$750

ask Mark





Mark Pederson  
<markpederson@rollprint .com  
>

To  
Subject SEP Proposal

10/19/2004 08:36 AM

Jamie,


Attached is the outline of our SEP Proposal. I was hoping to get this to you ASAP, so that you could move forward with the analysis of the project. The justification for the SEP, it meeting US EPA's SEP policy, and Rollprint's obligation to implement the SEP will follow in the mail with a hard copy of this proposal. I am currently working on Rollprints response to the complaint. However, if this analysis can move quickly and we can settle prior to the due date of the response, that would be a benefit to both of us. If you should have any questions, please call.

Mark Pederson, EHS Manager  
Rollprint Packaging Products, Inc.  
630-628-1700 x-3322



<<SEP Proposal.doc>> SEP Proposal.doc

Connie  
Puchalski/R5/USEPA/US  
10/14/2004 03:31 PM

To Michael Berman/R5/USEPA/US@EPA  
cc Jamie Paulin/R5/USEPA/US@EPA  
bcc  
Subject Re: Rollprint Packaging 

Mike-This letter is fine with me. Connie  
Michael Berman/R5/USEPA/US

Michael  
Berman/R5/USEPA/US  
10/14/2004 03:06 PM

To  
Subject Rollprint Packaging

Attached is a draft of a letter we are sending to Rollprint. I am submitting it for your review since it discusses both Rollprint's settlement offer and EPA's position on this offer (See paras. 1 and 3). Please let me know if you have any comments. Thank you



Rollprint.Pedersen.letter1.draft3





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SEP 29 2004

DE-9J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Dhuanne Dodrill  
President  
Rollprint Packaging Products, Inc.  
320 South Stewart Avenue and 335 South Stewart Avenue  
Addison, Illinois 60101

Re: Administrative Complaint and Compliance Order  
Rollprint Packaging Products, Inc.  
U.S. EPA ID. NO.: ILD 984 766 642 and ILR 000 049 429

RCRA-05- 2004 0018

Dear Ms. Dodrill:

Enclosed please find an Administrative Complaint and Compliance Order (Complaint), which specifies the United States Environmental Protection Agency's (U.S. EPA's) determination that Rollprint Packaging Products, Inc. violated certain requirements of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 et seq., as amended.

This determination is based on information collected during a compliance evaluation inspection (CEI) conducted at Rollprint Packaging Products, Inc., located at 320 South Stewart Avenue and 335 South Stewart Avenue, Addison, Illinois, on October 30, 2002, and during a follow up site visit conducted on July 14, 2003, by the U.S. EPA and based on your response to a Section 3007 of RCRA, as amended, 42 U.S.C. § 6927 request for information from U.S. EPA dated February 19, 2004. The allegations in the enclosed Complaint state the reasons for U.S. EPA's determination.

Accompanying this Complaint is a notice of opportunity for hearing. Should you desire to contest the Complaint, a written request for a hearing is required to be filed within 30 days after your receipt of the Complaint. The request for a hearing must be filed with the Regional Hearing Clerk (R-19J), United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604. A copy of your request should also be sent to Mr. Michael R. Berman, Office of Regional Counsel (C-14J), 77 West Jackson Boulevard, Chicago, Illinois 60604. Mr. Berman's telephone number is (312) 886-6837.



Regardless of whether you choose to request a hearing within the prescribed time limit following the filing of this Complaint, you are extended an opportunity to request an informal settlement conference. Topics for discussion at the settlement conference may include the establishment of a compliance schedule or the mitigation of the proposed penalty in accordance with the U.S. EPA guidance on pollution prevention and supplemental environmental projects. A request for an informal settlement conference with the U.S. EPA will not affect or extend the 30 day deadline to file an answer in order to avoid a finding of default on the Complaint.

If you have any questions or desire to request an informal conference for the purpose of conducting settlement discussions, please contact Ms. Jamie Paulin, United States Environmental Protection Agency, Waste, Pesticides and Toxics Division, Enforcement and Compliance Assurance Branch (DE-9J), 77 West Jackson Boulevard, Chicago, Illinois 60604. Ms. Paulin's phone number is (312) 886-1771.

Sincerely,



Harriet Croke, Acting Chief  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division

Enclosure

cc: Todd Marvel, IEPA  
Mark E. Pederson, Rollprint Packaging Products, Inc.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

IN THE MATTER OF: )

Rollprint Packaging Products Inc. )  
320 South Stewart Ave. and )  
335 South Stewart Ave. )  
Addison, Illinois 60101 )

U.S. EPA ID. NO. ILD 984766642 )

ILR 000049429 )

RESPONDENT )  
\_\_\_\_\_ )

DOCKET NO. **RCRA-05- 2004 0018**

COMPLAINT,  
COMPLIANCE ORDER, AND  
NOTICE OF OPPORTUNITY  
FOR HEARING

**COMPLAINT AND COMPLIANCE ORDER**

**I. COMPLAINT**

U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
REGION 5

04 SEP 29 AM 1:19

RECEIVED  
REGIONAL HEARING

1. This is a civil administrative action instituted under Section 3008(a) of the Solid Waste Disposal Act, as amended, also known as the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. Section 6928(a). RCRA was amended in 1984 by the Hazardous and Solid Waste Amendments of 1984 (HSWA), 42 U.S.C. §§ 6921-6939. This action is also instituted under Sections 22.1(a)(4), 22.13 and 22.37 of the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits" (Consolidated Rules), codified at 40 C.F.R. Part 22.

2. Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA; 42 U.S.C. §§ 6912(a)(1), 6926(b), and 6928.

3. The Complainant is, by lawful delegation, the Chief, Enforcement and Compliance

Assurance Branch, Waste, Pesticides and Toxics Division, Region 5, United States Environmental Protection Agency (U.S. EPA).

4. The Respondent is Rollprint Packaging Products, Inc. ("Respondent"), which is and was at all times relevant to this Complaint, a corporation incorporated under the laws of Illinois, and the owner and operator of two "facilities" as defined at 35 Illinois Administrative Code (IAC) Section 720.110 [40 C.F.R. § 260.10], located at 320 South Stewart Avenue ("Facility A") and 335 South Stewart Avenue ("Facility B"), Addison, Illinois, 60101.

5. U.S. EPA has provided notice of commencement of this action to the State of Illinois pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2).

#### **Statutory and Regulatory Background**

6. U.S. EPA has promulgated regulations, codified at 40 C.F.R. Parts 260 through 279, governing generators and transporters of hazardous waste and facilities that treat, store and dispose of hazardous waste, including used oil.

7. Under Section 3006 of RCRA, 42 U.S.C. § 6926, the Administrator of U.S. EPA may authorize a state to administer the RCRA hazardous waste program in lieu of the federal program when the Administrator finds that the state program meets certain conditions. Any violation of regulations promulgated under Subchapter III (Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6939(e)) or of any state provision authorized under Section 3006 of RCRA, constitutes a violation of RCRA, subject to the assessment of civil penalties and issuance of compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

8. Under Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), the Administrator of U.S. EPA granted the State of Illinois final authorization to administer a state hazardous waste program in lieu

of the federal government's base RCRA program effective on January 31, 1986. 51 Fed. Reg. 3778 (January 31, 1986). The Administrator of U.S. EPA granted final authorization to administer additional RCRA and certain HSWA requirements effective March 5, 1988, 53 Fed. Reg. 126 (January 5, 1988); April 30, 1990, 55 Fed. Reg. 7320 (March 1, 1990); June 3, 1991, 56 Fed. Reg. 13595 (April 3, 1991); August 15, 1994, 59 Fed. Reg. 30525 (June 14, 1994); May 14, 1996, 61 Fed. Reg. 10684 (March 15, 1996); October 4, 1996, 61 Fed. Reg. 40520 (August 5, 1996). The U.S. EPA-authorized Illinois regulations are codified at Title 35 Illinois Administrative Code (IAC) Part 703 *et seq.* See also 40 C.F.R. § 272.700 *et seq.*

9. Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), provides U.S. EPA with the authority to enforce State regulations in those States authorized to administer a hazardous waste program.

10. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified period of time, or both.

11. Section 3005(a) of RCRA, 42 U.S.C. § 6925(a), prohibits the treatment, storage, or disposal of hazardous waste except in accordance with a permit. It requires each person owning or operating a facility at which hazardous waste is treated, stored or disposed (TSD facility) to have a permit issued by U.S. EPA or the authorized state. U.S. EPA has promulgated regulations at 40 C.F.R. Part 270 that establish permitting requirements and procedures. The federally-authorized Illinois regulations that govern (in lieu of analogous federal regulations) the issuance of permits are codified at 35 IAC Parts 702 and 703.

12. Section 3005(e) of RCRA, 42 U.S.C. § 6925(e) includes a provision for "interim status" which allows TSD facilities to operate in certain circumstances pending receipt of a permit. U.S.

EPA promulgated standards at 40 C.F.R. Part 265 that are applicable to facilities subject to interim status requirements. The federally-authorized Illinois regulations that govern (in lieu of analogous federal regulations) the interim status standards for owners and operators of hazardous waste TSD facilities are codified at 35 IAC Part 725.

13. Facilities that treat, store, or dispose of hazardous waste must obtain a permit or interim status pursuant to 35 IAC § 703.121(a), and Sections 3005 and 3006 of RCRA, 42 U.S.C. §§ 6925-6926.

14. Any violation of regulations promulgated pursuant to Subchapter III, Sections 3001-3023 of RCRA, 42 U.S.C. §§ 6921-6039, or any State program authorized by U.S. EPA pursuant to Section 3006 of RCRA, 42 U.S.C. § 6926, constitutes a violation of RCRA, subject to the assessment of civil or criminal penalties and compliance orders as provided in Section 3008 of RCRA, 42 U.S.C. § 6928.

15. Under 35 IAC § 720.110 [40 C.F.R. § 260.10], a “generator” means any person, by site, whose act or process produces hazardous waste identified or listed in 35 IAC § 721 [40 C.F.R. § 261] or whose act first causes a hazardous waste to become subject to regulation.

16. Under 35 IAC § 720.110 [40 C.F.R. § 260.10], a “small quantity generator” means a generator who generates less than 1000 kilograms of hazardous waste in a calendar month.

17. Under 35 IAC § 720.110 [40 C.F.R. § 260.10] “storage” means the holding of hazardous waste for a temporary period at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.

18. 35 IAC § 703.121 states that each person owning or operating a hazardous waste storage facility must have a permit or have applied for a permit [40 C.F.R. § 270.1].



19. However, under 35 IAC § 722.134(a) [40 C.F.R. § 262.34(a)], generators of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the generator complies with the following provisions: 35 IAC § 722.134 (a)(1)(A), (a)(1)(B), (a)(2), (a)(3) and (a)(4) [40 C.F.R. § 262.34 (a)(1)(i), (a)(1)(ii), (a)(2) and (a)(3) and (a)(4)].

20. Under 35 IAC § 722.134(c)(1) [40 C.F.R. § 262.34(c)(1)] a generator may accumulate 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate that is under the control of the operator of the process generating the waste without a permit or interim status provided the generator complies with 35 IAC 725.273(a) [40 C.F.R. § 265.173(a)].

21. Under 35 IAC § 722.134(d) [40 C.F.R. § 262.34(d)], a generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, provided that the generator complies with the following provisions: 35 IAC § 722.134(d)(1), (d)(2), (d)(3), (d)(4) and (d)(5) [40 C.F.R. § 262.34(d)(1), (d)(2), (d)(3), (d)(4) and (d)(5)].

#### **General Allegations**

22. Respondent is a manufacturer of flexible and semi-rigid packaging materials, having North American Industry Classification System (NAICS) codes of 322221 and 322225, for the medical, food, and industrial markets

23. Respondent generates and/or stores “solid wastes” at both Facility A and at Facility B, as defined in 35 IAC § 721.102 [40 C.F.R. § 261.2].

24. As a result of the operation of a manufacturing process at both Facility A and Facility

B, Respondent generates and stores "hazardous waste" at both of these facilities, as defined in 35 IAC § 721.103 [40 C.F.R. § 261.3].

25. Respondent notified the Illinois Environmental Protection Agency (Illinois EPA) and U.S. EPA, on or about August 31, 1981, that it generates hazardous wastes in an amount greater than 1000 kilograms a month, at Facility A, however storage of Facility A is supposed to be for less than 90 days.

26. Respondent notified the Illinois EPA and U.S. EPA on or about March 26, 1998 that it generates hazardous wastes, at Facility B.

27. The U.S. EPA inspector during his site inspection of Facility B on October 30, 2002 determined that Facility B is a small quantity generator and that it generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month.

28. Respondent has never filed, with the U.S. EPA or with the Illinois EPA, a RCRA Part A permit application for the storage of hazardous waste at Facility A or Facility B.

29. Respondent's Facility A or Facility B have never operated under interim status, pursuant to 35 IAC § 703.121(a) [40 C.F.R. § 270.1(a)], for the storage of RCRA hazardous waste.

30. Respondent's Facility A is a "generator" of hazardous waste and is subject to regulation under 35 IAC Part 722 [40 C.F.R. Part 262], including 722.134, [40 C.F.R. Section 262.34] for generators who generate hazardous waste greater than 1000 kilograms in a calendar month.

31. Respondent's Facility B is a "small quantity generator" (SQG), and is subject to regulation under 35 IAC Part 722 [40 C.F.R. Part 262], including 722.134(d), [40 C.F.R. Section 262.34(d)], for generators who generate hazardous waste greater than 100 kilograms but less than 1000 kilograms in a calendar month.

32. On or about October 30, 2002, U.S. EPA conducted a compliance evaluation inspection (CEI) at Respondent's Facility A and Facility B to determine compliance with Illinois hazardous waste management regulations.

33. On or about July 14, 2003, U.S. EPA conducted a site visit at Respondent's Facility A and Facility B to determine if there were any changes made since the CEI that was conducted on October 30, 2002.

34. As a result of the October 30, 2002 CEI at Respondent's Facility A and Facility B, the July 14, 2003 site visit at the Respondent's Facility A and Facility B, the Respondent's response to a Section 3007 of RCRA, as amended, 42 U.S.C. § 6927 request for information from U.S. EPA dated February 19, 2004, U.S. EPA determined the following:

**COUNT 1**

35. Complainant incorporates paragraphs 1 through 34 of this Complaint as though set forth in this paragraph.

36. 722 IAC § 134(a)(1)(A) [40 C.F.R. § 262.34 (a)(1)(i)] requires generators without a permit or interim status to comply with the applicable requirements of Subpart I of Part 725, [Subpart I of 40 C.F.R. Part 265], including 35 IAC § 725.273, [40 C.F.R. § 265.173], Use and Management of Containers.

37. 35 IAC § 722.134(d) [40 C.F.R. § 262.34(d)], provides that a generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, provided that the generator complies with, among other provisions, 35 IAC § 722.134(d)(2), [40 C.F.R. § 262.34(d)(2)], including Subpart I, 35 IAC

§725.273 [40 C.F.R. § 265.173].

38. Under 35 IAC 722.134(c)(1) [40 C.F.R. § 262.34(c)(1)] a generator may accumulate 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate that is under the control of the operator of the process generating the waste without a permit or interim status provided the generator complies with 35 IAC § 725.273(a) [40 C.F.R. § 265.173(a)].

39. 35 IAC Section 725.273(a) [40 C.F.R. § 265.173(a)] requires that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

40. Respondent has a satellite container for hazardous waste, consisting of a 55 gallon drum located in a cabinet, in the Ultralam area of Facility A.

41. On October 30, 2002, a U.S. EPA inspector observed that the 55 gallon drum, a satellite container, containing hazardous waste, located in a cabinet, in the Ultralam area of Facility A was open when it was not necessary to add or remove waste.

42. Respondent has two satellite containers for hazardous waste, consisting of two 55 gallon drums located in cabinets, in the GFG/Dual Flex area of Facility A.

43. On October 30, 2002, a U.S. EPA inspector observed that the two 55 gallon drums, satellite containers, containing hazardous waste located in cabinets in the GFG/Dual Flex Area of Facility A were open when it was not necessary to add or remove waste.

44. Respondent has a satellite accumulation container for hazardous waste, consisting of a 55 gallon drum, in the 660 Press area of Facility A.

45. On October 30, 2002, a U.S. EPA inspector observed that the 55 gallon drum, a satellite

container, containing hazardous waste in the 660 Press Area of Facility A was open when it was not necessary to add or remove waste.

46. Respondent has a container for hazardous waste, consisting of a 55 gallon drum, located in the 90 day storage area of Facility A.

47. On October 30, 2002, a U.S. EPA inspector observed that the 55 gallon drum, containing hazardous waste, covered only by a ½ lid on its top, in the 90 day storage area of Facility A was open when it was not necessary to add or remove waste.

48. On July 14, 2003, a U.S. EPA Inspector revisited Respondent's Facility A and Facility B and observed that a 55 gallon drum, a satellite accumulation container, containing hazardous waste was open when it was not necessary to add or remove waste.

49. Therefore, Respondent failed to comply with 35 IAC § 725.273(a) [40 C.F.R. § 265.173(a)], when several satellite accumulation containers containing hazardous waste were not closed during storage when it was not necessary to add or remove waste.

## **COUNT 2**

50. Complainant incorporates paragraphs 1 through 34 of this Complaint as though set forth in this paragraph.

51. 35 IAC § 722.134(d) [40 C.F.R. § 262.34(d)] requires that a generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, provided that the generator complies with the requirements of Subpart C of 35 IAC part 725 [Subpart C of part 40 C.F.R. part 265], including 35 IAC § 725.131 [40 C.F.R. § 265.31].



52. 35 IAC § 725.131 [40 C.F.R. § 265.31] requires that Facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment.

53. Respondent has a satellite accumulation container for hazardous waste, consisting of a 55 gallon drum, located in the Eagen Extrusion Laminator of Facility B.

54. On October 30, 2002, the U.S. EPA Inspector observed the 55 gallon drum, a satellite accumulation container, containing hazardous waste with an open funnel, in the Eagan Extrusion Laminator of Facility B.

55. The 55 gallon drum was not labeled.

56. The hazardous waste in the drum was flammable.

57. The U.S. EPA Inspector observed solidified material inside the funnel upon looking inside the 55 gallon drum.

58. The U.S. EPA Inspector also observed an operator pouring flammable waste into the drum via the funnel from a 5 gallon container, causing the funnel to overflow, spilling the material onto the floor.

59. The U.S. EPA Inspector also observed the operator adding another 5 gallon container into the same 55 gallon drum.

60. The U.S. EPA inspector did not observe any clean up of the waste.

61. Therefore, Respondent failed to comply with 35 IAC § 725.131 [40 C.F.R. § 265.31], when flammable hazardous waste spilled onto the floor via a clogged funnel, thus failing to minimize the possibility of fire, explosion or release which could threaten human health or the

environment.

### COUNT 3

62. Complainant incorporates paragraphs 1 through 34 of this Complaint as though set forth in this paragraph.

63. Under 35 IAC § 722.134(d) [40 C.F.R. § 262.34(d)], a generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, provided that:... (5) The generator complies with the following requirements... (ii) The generator must post the following information next to the telephone:... (A) The name and telephone number of the emergency coordinator; ...

64. On October 30, 2002 and on July 14, 2003, the U.S. EPA's inspector observed that the emergency coordinator's name and telephone number were not posted next to the telephone in Facility B.

65. Therefore, Respondent failed to comply with 35 IAC § 722.134(d)(5)(B)(i) [40 C.F.R. § 262.34(d)(5)(ii)(A)] when it failed to post the emergency coordinator's name and telephone number next to the telephone in Facility B.

### COUNT 4

66. Complainant incorporates paragraphs 1 through 34 of this Complaint as though set forth in this paragraph.

67. Under 35 IAC § 722.134(d) [40 C.F.R. § 262.34(d)], a generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having

interim status, provided that:... (5) The generator complies with the following requirements... (ii) The generator must post the following information next to the telephone:... (B) Location of fire extinguishers and spill control material, ...

68. On October 30, 2002 and on July 14, 2003, U.S. EPA Inspectors observed that the location of fire extinguishers and spill control equipment was not posted next to the telephone in Facility B.

69. Therefore, Respondent failed to comply with 35 IAC § 722.134(d)(5)(B)(ii) [40 C.F.R. § 262.34(d)(5)(ii)(B)] when it failed to post the location of the fire extinguisher and spill control equipment next to the telephone in Facility B.

#### **COUNT 5**

70. Complainant incorporates paragraphs 1 through 69 of this Complaint as though set forth in this paragraph.

71. The requirements set forth at 35 IAC § 722.134(a) [40 C.F.R. § 262.34(a)] state that a generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that (1) The waste is placed in containers and the generator complies with, among other things, 35 IAC § 725.273 (a) [40 C.F.R. § 265.173(a)] which requires that a container holding hazardous must always be closed during storage, except when it is necessary to remove hazardous waste.

72. Under 35 IAC § 722.134(d) [40 C.F.R. § 262.34(d)], a generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status, provided that:.... (4) The generator complies with, among other things, 35 IAC

725.131 [40 C.F.R. 265.31], requiring that facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, and (5) The generator complies with the following requirements, among others,... (ii) The generator must post the following information next to the telephone: (A) The name and telephone number of the emergency coordinator; (B) Location of fire extinguishers and spill control material, ...35 IAC 722.134(d)(5)(B)(i) and (ii) [40 C.F.R. 262.34(d)(5)(ii)(A) and (B)].

73. Respondent does not have a hazardous waste storage permit or interim status for either Facility A or Facility B.

74. Respondent does not need a hazardous waste storage permit for Facility A or Facility B, if it meets the conditions for an exemption from a permit or if it meets the requirements for interim status.

75. Respondent did not meet these conditions for an exemption from a permit or for interim status at either Facility A or Facility B by keeping satellite accumulation containers open when not in use.

76. Respondent also did not meet these conditions for an exemption from a permit or for interim status at Facility B by not maintaining and operating the Facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, by not keeping the emergency coordinator's name and telephone number next to the telephone, and by not keeping the location of the fire extinguisher and spill

control equipment next to the telephone in Facility B.

77. Therefore Respondent failed to comply with 35 IAC §§ 702.120 (Permit Application), 702.123 (Information Requirements for a permit), 703.150(a) (Application by Existing HWM Facilities and Interim Status Qualifications), 703.180 (Application in General), and 703.181 (Contents of Part A) [40 C.F.R. §§ 270.10(a),(d) and (e); and 270.13] by failing to file the proper permit application for a hazardous waste storage permit within 30 days after its first noncompliance with any condition for an exemption from a permit in 35 IAC § 722.134 [40 C.F.R. § 262.34] because it did not meet the conditions for an exemption from a permit at Facility A or Facility B and did not meet the requirements for interim status at Facility A or Facility B.

## **II. PROPOSED CIVIL PENALTY**

The Administrator of U.S. EPA may assess a civil penalty of up to \$25,000 per day for each violation of Subtitle C of RCRA according to Section 3008 of RCRA, 42 U.S.C. § 6928. The Federal Civil Penalties Inflation Adjustment Act of 1990, as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, required U.S. EPA to adjust its penalties for inflation on a periodic basis. Under the Civil Monetary Penalty Inflation Adjustment Rule, published at 40 C.F.R. Part 19, U.S. EPA may assess a civil penalty of up to \$27,500 per day for each violation of Subtitle C of RCRA occurring or continuing on or after January 31, 1997.

Complainant determined the proposed civil penalty according to RCRA Section 3008, 42 U.S.C. § 6928. In assessing a civil penalty, the Administrator of U.S. EPA must consider “the seriousness of the violation and any good faith efforts to comply with applicable requirements.” Section 3008(a)(3) of RCRA, 42 U.S.C. § 6928(a)(3). Complainant has considered the facts and



circumstances of this case with specific reference to U.S. EPA's 2003 RCRA Civil Penalty Policy. A copy of the penalty policy is available upon request. This policy provides a consistent method of applying the statutory penalty factors to this case.

The Complainant proposes, subject to the receipt and evaluation of further relevant information from Respondent, that the Administrator assess a civil penalty of \$27,665 for the violations alleged in this Complaint, as further explained in Attachment A, "Penalty Summary Sheet." Respondent may pay this penalty by certified or cashier's check, payable to "Treasurer, the United States of America," and remit to:

U.S. Environmental Protection Agency, Region 5  
P.O. Box 70753  
Chicago, Illinois 60673

A copy of the check shall be sent to:

Michael R. Berman  
Office of Regional Counsel (C-14J)  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

and

Jamie L. Paulin  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides & Toxics Division (DE-9J)  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

A transmittal letter identifying this Complaint shall accompany the remittance and the copy of the check.

### **III. PROPOSED COMPLIANCE ORDER**

Based on the foregoing, Respondent is hereby ordered, under the authority in 3008(a) of RCRA, 42 U.S.C. § 6928(a), and 40 C.F.R. § 22.37(b), to comply with the following

requirements immediately upon the effective date of this Order:

1. Respondent shall immediately achieve and maintain compliance with all requirements and prohibitions governing the storage, treatment and disposal of hazardous waste, codified at or incorporated by 35 IAC Part 703 *et seq.*, and 40 C.F.R. Parts 260 through 279.

2. Respondent shall submit all reports, submissions, and notifications required by this Order to the United States Environmental Protection Agency, Region 5, Waste, Pesticides and Toxics Division, Enforcement and Compliance Assurance Branch, Attention: Jamie L. Paulin (DE-9J), 77 West Jackson Boulevard, Chicago, Illinois 60604-3590.

#### **IV. OPPORTUNITY TO REQUEST A HEARING**

You have the right to request a hearing to contest any material fact in this Complaint, or to contest the amount of the proposed penalty, or both, as provided in Section 3008(b) of RCRA, 42 U.S.C. § 6928(b), and in accordance with the Consolidated Rules. A copy of these rules accompanies this Complaint. To request a hearing, Respondent must specifically make the request in a written Answer to this Complaint. Respondent must file its written Answer with the Regional Hearing Clerk within 30 calendar days of receiving the Complaint, 40 C.F.R.

§ 22.15(a). In counting the 30-day time period, the actual date of receipt is not included. Saturdays, Sundays, and federal legal holidays are included in the computation. If the 30-day period expires on a Saturday, Sunday or federal legal holiday, the time period is extended to include the next day which is not a Saturday, Sunday or federal legal holiday. 40 C.F.R. § 22.7(a).

The Answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint with respect to which Respondent has any knowledge, or

clearly state that Respondent has no knowledge as to particular factual allegations in the Complaint. The Answer shall also state the following:

1. The circumstances or arguments alleged to constitute the grounds of defense;
2. the facts Respondent intends to place at issue; and
3. whether Respondent requests a hearing.

Where Respondent states that it has no knowledge of a particular factual allegation, the allegation is deemed denied. Respondent's failure to admit, deny, or explain any material fact in the Complaint constitutes an admission of that allegation. 40 C.F.R. § 22.15.

Respondent must file its Answer with the Regional Hearing Clerk (R-19J), U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604. A copy of the Answer and any subsequent documents filed in this action should be sent to Michael Berman, Office of Regional Counsel (C-14J), U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590. Mr. Berman may be telephoned at (312) 886-6837.

If Respondent fails to file a timely written Answer to the Complaint, with or without a request for a hearing, the Regional Administrator or Presiding Officer may issue a Default Order under 40 C.F.R. § 22.17. For purposes of this action only, default by Respondent constitutes an admission of all facts alleged in the Complaint and a waiver of Respondent's right to a hearing on the factual allegations under Section 3008 of RCRA, 42 U.S.C. § 6928. Default will also result in the penalty proposed in the Complaint becoming due and payable by Respondent without further proceedings 30 days after issuance of a final order upon default under 40 C.F.R. § 22.27(c). In addition, default will preclude Respondent from obtaining adjudicative review of

any of the provisions contained in the Proposed Compliance Order section of the Complaint.

A hearing upon the issues raised in the Complaint and Answer shall be held (upon the request of Respondent in the Answer) and conducted according to the Administrative Procedures Act, 5 U.S.C. § 551 *et seq.* The hearing will be in a location determined under 40 C.F.R. § 22.21(d).

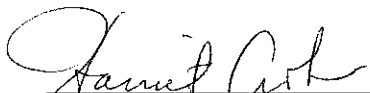
#### **V. SETTLEMENT CONFERENCE**

Whether or not you, as Respondent, request a hearing, you may request an informal conference to discuss the facts of this case and to arrive at a settlement. To request a settlement conference, Respondent should write to Jamie L. Paulin, Enforcement and Compliance Assurance Branch (DE-9J), United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590, or telephone Ms. Paulin at (312) 886-1771.

Your request for an informal settlement conference does not extend the 30-day period during which you must submit a written Answer and Request for Hearing. Respondent may pursue the informal conference procedure simultaneously with the adjudicatory hearing procedure.

U.S. EPA encourages all parties for whom a civil penalty is proposed to pursue the possibilities of settlement through an informal conference. U.S. EPA, however, will not reduce the penalty simply because the parties hold a conference. The parties will embody any settlement that they may reach as a result of the conference in a written Consent Agreement and Final Order (CAFO) issued by the Director, Waste, Pesticides and Toxics Division, U.S. EPA, Region 5. The issuance of a CAFO shall constitute a waiver of Respondent's right to request a hearing on any stipulated matter in the CAFO.

Dated this 28th day of September, 2004.



Harriet Croke, Acting Chief  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division  
U.S. Environmental Protection Agency  
Region 5

Complaint Docket No. RORA-05- 2004 0018



**ATTACHMENT A**  
**PENALTY SUMMARY SHEET**  
Rollprint Packaging Products, Inc. - Addison, ILLINOIS

NATURE OF VIOLATION	CITATION OF REGULATION OR LAW	HARM/ DEVIATION	GRAVITY-BASED PENALTY	MULTI-DAY PENALTY	ECONOMIC BENEFIT	ADJUSTMENTS	TOTAL PENALTY
<b>COUNT 1:</b> Failure to file permit required; operating without a permit.	35 IAC 702.120. 702.123 & 703.150(a) [40 CFR 270.10(a), (e)]	minor/ major	\$2,475	\$0.00	\$2,887	\$0.00	\$2,475
<b>COUNT 2:</b> Failure to keep satellite accumulation containers closed when not in use.	35 IAC 722.134(c)(1)(A) [40 CFR 262.34(c)(1)(i)]	moderate/ moderate	\$13,640 2 x \$6,820	\$0.00	< \$200 \$2	\$0.00	\$13,640
<b>COUNT 3:</b> Failure to minimize the possibility of fire, explosion or release. (335 S. Stewart.)	35 IAC 725.131 [40 CFR 265.31]	moderate/ moderate	\$7,150	\$0.00	< \$200 \$1	\$0.00	\$7,150
<b>COUNT 4:</b> Failure to have emergency coordinator name and telephone number next to the telephone. (335 S. Stewart.)	35 IAC 722.134(d)(5)(B)(i) [40 CFR 262.34(d)(5)(ii)(A)]	minor/ moderate	\$2,200 2 x \$1,100	\$0.00	< 200 \$8	\$0.00	\$2,200
<b>COUNT 5:</b> Failure to have location of fire extinguishers and spill control equipment next to the telephone. (335 S. Stewart.)	35 IAC 722.134(d)(5)(B)(ii) [40 CFR 262.34(d)(5)(ii)(B)]	minor/ moderate	\$2,200 2 x \$1,100	\$0.00	< \$200 \$8	\$0.00	\$2,200
<b>Subtotals</b>	<b>5 COUNT(S)</b>		<b>\$27,665</b>	<b>\$0.00</b>	<b>\$2,887</b>	<b>\$0.00</b>	<b>\$27,665</b>

Notes: 1. The gravity-based penalty amount is determined using the penalty assessment matrix found at page 18 of the RCRA Civil Penalty Policy, issued on June 23, 2003. The multi-day component of the gravity-based civil penalty is determined using the multi-day matrix found at page 26 of the RCRA Civil Penalty Policy. Policy adjustments and economic benefit are as explained in the RCRA Civil Penalty Policy. Copies of the June 2003 RCRA Civil Penalty Policy can be found at [www.epa.gov](http://www.epa.gov).

2. The economic benefit of noncompliance (EBN) of \$2,887 was not pursued based on the RCRA Civil Penalty Policy, June 2003, Section VIII. Effect of Economic Benefit of Noncompliance, pg. 28.

CASE NAME: Rollprint Packaging Products, Inc.

DOCKET NO:

RCRA-05- 2004 0018

### CERTIFICATE OF SERVICE

I hereby certify that today I filed the original of this **Compliant and Compliance Order** and this **Certificate of Service** in the office of the Regional Hearing Clerk (E-19J), United States Environmental Protection Agency, Region 5, 77 W. Jackson Boulevard, Chicago, IL 60604-3590.

I further certify that I then caused true and correct copies of the filed document to be mailed on **SEP 29 2004** Via Certified Mail, Return Receipt Requested to the following:

# 7001 0320 0006 1451 9300

Dhuanne Dodrill.  
President  
Rollprint Packaging Products, Inc.  
320 South Stewart Avenue  
Addison, Illinois 60101-3310

And Via 1<sup>st</sup> Class Mail

Todd Marvel  
RCRA Coordinator  
Post Office Box 19276  
1021 North Grand Avenue East  
Springfield IL, 62702-3998

Dated:

*September 29, 2004*

US ENVIRONMENTAL  
PROTECTION AGENCY  
REGION 5


04 SEP 29 11:24

RECEIVED  
REGIONAL HEARING CLERK

  
Ronza J. Jordan

Administrative Program Asst.  
Waste, Pesticides and Toxics  
Division  
United States Environmental  
Protection Agency  
77 W. Jackson Boulevard  
Chicago, IL 60604-3590  
(312) 353-0849

Michael  
Berman/R5/USEPA/US  
09/29/2004 02:19 PM

To Jamie Paulin/R5/USEPA/US@EPA  
cc Connie Puchalski/R5/USEPA/US@EPA  
bcc  
Subject Re: Rollprint Congressional Correspondence 

This looks okay.  
Jamie Paulin/R5/USEPA/US

Jamie Paulin/R5/USEPA/US To  
09/29/2004 01:16 PM Subject Rollprint Congressional Correspondence

Hi Mike!

I have added a few sentences addressing Harriet's concerns. Would you mind taking a look to see if its ok?

Thank you again for all of your help! I do appreciate it!

Jamie



Rollprint Congressional Response.wpd

---

Jamie L. Paulin  
Chemist  
U.S. Environmental Protection Agency, Region 5  
Waste, Pesticides, Toxics Division  
Enforcement and Compliance Assurance Branch  
77 West Jackson Blvd.  
Chicago, IL 60604-3590  
phone: 312-886-1771  
fax: 312-353-4342

Lorna Jereza /R5/USEPA/US      To  
09/28/2004 04:15 PM      Subject Fw:


Please change the language in your complaints due for issuance at year end to reflect the indicated revision below.

----- Forwarded by Lorna Jereza/R5/USEPA/US on 09/28/2004 04:12 PM -----

Harriet Croke /R5/USEPA/US      To  
09/28/2004 03:58 PM      Subject Fw:

----- Forwarded by Harriet Croke/R5/USEPA/US on 09/28/2004 03:58 PM -----

Connie  
Puchalski/R5/USEPA/US  
09/28/2004 02:47 PM

To      Leverett Nelson/R5/USEPA/US@EPA, Michael  
Berman/R5/USEPA/US@EPA, Kevin  
Chow/R5/USEPA/US@EPA  
Harriet Croke/R5/USEPA/US@EPA, James  
Cha/R5/USEPA/US@EPA, Kevin  
Chow/R5/USEPA/US@EPA, Larry  
cc      Kyte/R5/USEPA/US@EPA, Michael  
Berman/R5/USEPA/US@EPA, Sandra  
Lee/R5/USEPA/US@EPA, Susan  
Prout/R5/USEPA/US@EPA  
Subject      Re: 

That looks fine to me. Connie  
Leverett Nelson/R5/USEPA/US

Leverett  
Nelson/R5/USEPA/US      To  
09/28/2004 02:34 PM      Subject

Here's a revision that I just created for substitution in the RCRA model complaint. It may be a good starting point (or ending point, if I'm lucky).

-Rett

**To request a hearing, Respondent must specifically make the request in a written Answer to this Complaint. Respondent must file its written Answer with the Regional Hearing Clerk within 30 days of the date of service of this Complaint.** Consolidated Rules at § 22.15(a). Service of the Complaint is complete when the return receipt is signed. Consolidated Rules at § 22.7(c). In counting the 30-day time period, the actual date of receipt is not included. Saturdays, Sundays, and federal legal holidays are included in the computation. If the 30-day period expires on a Saturday, Sunday or federal legal holiday, the time period is extended to include the next day which is not a Saturday, Sunday or federal legal holiday. Consolidated Rules at § 22.7(a).



# RCRA 3008(a) ADMINISTRATIVE COMPLAINT CONCURRENCE/ROUTING FORM

## ART I. Background

FACILITY NAME Rollprint Packaging Products Inc. EPA ID# ILB 984 766 642/ ILR 000049429  
 ECAB ASSIGNEE Jamie Paulin ASST. REG. COUNSEL Michael Berman  
 PHONE 6-1771 PHONE 6-6837

Date of referral, if any, by State \_\_\_\_\_  
 Small Business per SBREFA(Y/N), if yes, date of letter \_\_\_\_\_  
 Date of Letter of Notice to the State 8/24/2004

## PART II. Proposed Complaint — Concurrences

The proposed Complaint package must include the following documents:

- Tab 1. Transmittal letter
- Tab 2. Complaint, including penalty table
- Tab 3. Transmittal letter attachments - Photocopy of
  - (A) Current version of 40 CFR Part 22
  - (B) RCRA Civil Penalty Policy (optional)
  - (C) Any other attachments referenced
- Tab 4. Certificate of Service
- Tab 5. Supporting documents
  - (A) Penalty calculation worksheets
  - (B) BEN reports
  - (C) Draft press release
  - (D) RCRAinfo form
  - (E) Weekly report
- Tab 6. Addressed envelopes.

	INITIALS	DATE	CONCUR	CONCUR WITH MODIFICATIONS
1. ECAB ASSIGNEE	<i>JLP</i>	9/15/04		
2. ECAB SEC. CHIEF	<i>King</i>	9/23/04		
3. ASSOC. REG. COUNSEL	<i>MB</i>	9/24/04		With edits and request <i>JLP 9/28/04</i>
4. ORC SECTION CHIEF	<i>CW</i>	9/24/04		
5. ECAB CHIEF	<i>HOC</i>	9/28/04	✓	

The ECAB Chief returns it to the ECAB Assignee for corrections, if necessary, or to the Administrative Program Assistant, if signed.

## PART III. Filing and Distribution

Date filed with Regional Hearing Clerk 9/29/04 Initials *[Signature]* (Administrative Program Assistant or, if needed, Section Secretary)

Date mailed 9/29/04 Initials *[Signature]* (The Section Secretary makes copies and mails and distributes the copies.)

The Section Secretary returns the remaining portion of the Complaint package to the ECAB Assignee along with a true copy of what was filed with the Regional Hearing Clerk.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 24 2004

D-9J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

William Child, Chief  
Bureau of Land  
Environmental Protection Agency  
State of Illinois  
1021 North Grand Avenue East  
Springfield, Illinois 62702-4193

Re: Rollprint Packaging Products, Inc.  
EPA I.D. No.: ILD 984 766 642 / ILR 000 049 429


Dear Mr. Child:

Pursuant to Section 3008(a)(2) of the Resource Conservation and Recovery Act (RCRA), as amended, I am providing notice to you that the United States Environmental Protection Agency (U.S. EPA) is preparing to issue an Order under Section 3008(a)(1) to the Rollprint Packaging Inc., 320 South Stewart Avenue and 335 South Stewart Avenue, Addison, Illinois 60101. The Order is in response to the October 30, 2002 inspection by the U.S. EPA, and addresses violations of the Illinois regulations codified at 35 Illinois Administrative Code (IAC) Part 703 *et seq*; standards applicable to generators of hazardous waste, including 35 IAC 703.121(a)(1) for operating a hazardous waste storage facility without interim status or permit.

If you have any questions regarding this letter, please contact Jamie Paulin, of my staff, at (312) 886-1771.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Paul Little".

 Harriet Croke, Acting Chief  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division

cc: T. Marvel, Illinois EPA



## Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist  
☐ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☐ Information Request  
☐ Pre-Filing and Opportunity to Confer  
☒ State Notification of Enforcement Action

Facility Name: Rollprint Packaging Products Inc

Facility Location: 320 South Stewart Ave / 335 South Stewart Ave.

City: Addison State: IL 60101

U.S. EPA ID# RD 984 766.642 / TR 000 049 429

Assigned Staff Samir Paulin Phone: 6-1774

Name	Signature	Date
Author	<i>Samir Paulin</i>	8/17/04
Regional Counsel	<i>e-coneyrune (M. Berman, ORC)</i>	attached 8/23/04
Section Chief	<i>Lorne M. Jones</i>	8/23/04
Branch Chief	<i>Kate H. Crook</i>	8-23-04


### Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
  - One copy for the assigned staff;
  - One copy for the section file;
  - One copy for the branch file; and
  - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.  
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

*bcc: Michael Berman, ORC*

Michael  
Berman/R5/USEPA/US  
08/23/2004 12:55 PM

To Jamie Paulin/R5/USEPA/US@EPA  
cc  
bcc  
Subject Re: Rollprint state notification letter 

The letter to the State is okay. Please make sure the Illinois citation is correct - 35IAC703.121(a)(1). I also would like to get a copy of the applicable state regulations.  
Jamie Paulin/R5/USEPA/US

Jamie Paulin/R5/USEPA/US  
08/18/2004 08:25 AM

To  
Subject Rollprint state notification letter

Hi Mike!

Attached is a state notification letter for Rollprint. We need to send these types of letters to the state to inform them of any action we might take. It is just a generic letter stating that we will be bringing an Order against Rollprint at some time in the future.

Please look it over and let me know if you would like to make any changes.

Thanks for your help!

Jamie



Rollprint.StateNoticeLetter.wpd

---

Jamie L. Paulin  
Chemist  
U.S. Environmental Protection Agency, Region 5  
Waste, Pesticides, Toxics Division  
Enforcement and Compliance Assurance Branch  
77 West Jackson Blvd.  
Chicago, IL 60604-3590  
phone: 312-886-1771  
fax: 312-353-4342

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
BEFORE THE ADMINISTRATOR**

**In the Matter of**

**Rollprint Packaging Products, Inc.,**

**Respondent**

)  
)  
)  
)  
)

**Docket No. RCRA-05-2004-0018**

**ORDER INITIATING ALTERNATIVE DISPUTE  
RESOLUTION PROCESS AND APPOINTING NEUTRAL**

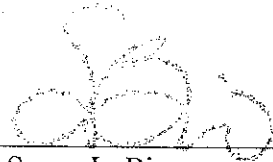
Pursuant to the request of the parties, Judge William B. Moran, is hereby designated as a neutral to initiate and conduct such processes as may facilitate a settlement of this proceeding.

The following procedures shall apply:

1. The Alternative Dispute Resolution (ADR) process will be conducted in a confidential manner. The Judge who serves as the neutral will not disclose to anyone the contents of any of the parties' ADR communications.
2. For the ADR process to be effective, the persons communicating with the neutral must either have authority to commit his or her side to a settlement, or have ready access to someone with such authority.
3. Unless terminated earlier at the request of either party, the ADR process shall automatically terminate on **January 10, 2005**. An extension of up to 60 days may be granted by the undersigned upon request of the ADR neutral, but in no event shall ADR continue for longer than 4 months. At that time, if no settlement has been reached, the case will be remanded to the litigation Judge to proceed with the litigation process in an expedited manner.

4. A party requesting termination of this process shall so advise the assigned neutral Judge either orally or in writing. The neutral Judge shall forward the request to the Chief Administrative Law Judge. The dispute resolution process initiated by this Order shall terminate upon order of the Chief Administrative Law Judge.

5. At the termination of the ADR process, the parties will be sent a questionnaire to elicit their views and the experience with the process. The contents of individual questionnaires will be kept confidential and will be made available to the neutrals and others only in a composite format.



---

Susan L. Biro  
Chief Administrative Law Judge

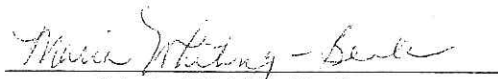
Dated: November 10, 2004  
Washington, DC



In the Matter of Rollprint Packaging Products, Inc., Respondent  
Docket No. RCRA-05-2004-0018

CERTIFICATE OF SERVICE

I certify that the foregoing **Order Initiating Alternative Dispute Resolution Process And Appointing Neutral**, dated November 10, 2004, was sent this day in the following manner to the addressees listed below.

  
\_\_\_\_\_  
Maria Whiting-Beale  
Legal Staff Assistant

Dated: November 10, 2004

Original And One Copy By Pouch Mail to:

Sonja Brooks-Woodard  
Regional Hearing Clerk  
U.S. EPA  
77 West Jackson Boulevard, E-19J  
Chicago, IL 60604-3590

Copy by Pouch Mail to:

Michael R. Berman, Esquire  
Associate Regional Counsel  
U.S. EPA  
77 West Jackson Boulevard, C-14J  
Chicago, IL 60604-3590

Copy by Regular Mail to:

Mark E. Pederson, Esquire  
Rollprint Packaging Products, Inc.  
320 Stewart Avenue  
Addison, IL 60101-3310



August 16, 2004

Jamie Paulin  
U.S. EPA  
77 West Jackson Boulevard, DE-9J  
Chicago, IL 60604-3590

Re: Permanent Total Enclosure

Dear Jamie

Enclosed is Rollprint Packaging Products Title V permit language for the three coater-laminators and Permanent Total Enclosure. Also included with this information are the latest test results for the Ultra-Lam PTE, which verifies compliance with Procedure T requirements in Appendix B of Section 52.741.

If you need any additional information, feel free to contact me.

Sincerely

Mark E. Pederson  
Environmental, Health & Safety Manager

cc: Dhuanne Dodrill, President and COO

encl.

## 7.0 UNIT SPECIFIC CONDITIONS

- 7.1 Unit 01 - Coater/Laminators  
Control 01 - PTE and Afterburners

### 7.1.1 Description

Three coater/laminators are used to laminate and coat films, foils, paper, and other composite materials using water-based or solvent-based coatings. Overlacquers and primers may also be applied on this equipment. The only difference between laminating and coating is that a secondary web is introduced during the laminating process. Each coater/laminator has a dryer to dry the coatings which is vented through a permanent total enclosure into a catalytic afterburner to control VOM emissions. VOM emissions result from the use of solvent based materials. Fuel combustion emissions results from the use of natural gas in the dryers and afterburners and are covered by Section 7.5.

### 7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
01	Coater/Laminators	
	Ultra-Lam Coater/Laminator	PTE and Afterburner
	GFG Coater/Laminator	PTE and Afterburner
	Duoflex Coater/Laminator	PTE and Afterburner

### 7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit-specific conditions, is each coater/laminator with respective dryer, permanent total enclosure, and catalytic afterburner.

- b. i. The affected coating lines are subject to the emission limits identified in Condition 5.2.2.

- ii. The affected coating lines are subject to 35 IAC 212.321(a), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises,

35 IAC Part 218 Procedure T of Appendix B. In this instance, the capture efficiency is assumed to be 100 percent and the emission unit is still required to measure control efficiency using appropriate test methods as specified in 35 IAC 218.105(d) [35 IAC 218.105(c) (1) (A)].

#### 7.1.5 Operational Limitations and Control Requirements

- a. Each affected coating line shall only be operated with natural gas as the fuel in the coating dryers and catalytic afterburner.
- b. The capture system and control device shall be operated at all times each affected coating line is in operation [35 IAC 218.207(a)] except when complying with 35 IAC 218.204.

#### 7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected coating lines are subject to the following:

- a. Operations and emissions of the Ultra-Lam Coater Laminator with catalytic afterburner shall not exceed the following limits:

VOM Usage		VOM Emissions	
(T/mo)	(T/yr)	(T/mo)	(T/yr)
17.11	205	3.25	39.0

- b. VOM emissions from cleaning solvent shall not exceed the following limits:

VOM Emissions	
(T/mo)	(T/yr)
0.013	0.16

The above limitations were established in Permit 91010089, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the



current month plus the preceding 11 months (running 12 months total). [T1]

#### 7.1.7 Testing Requirements

- a. The VOM content of each coating and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 [35 IAC 218.204 and 218.207(a)].
- b. Sources utilizing a PTE must demonstrate that this enclosure meets the requirement given in 35 IAC Part 218 Procedure T of Appendix B for a PTE during any testing of their control device [35 IAC 218.105(c) (3) (D)].
- c. The control device efficiency shall be determined by simultaneously measuring the inlet and outlet gas phase VOM concentrations and gas volumetric flow rates in accordance with the gas phase test methods specified in 35 IAC 218.105(f) [35 IAC 218.105(d) (1)].
- d. The following VOM gas phase source test methods shall be used to determine control device efficiencies [35 IAC 218.105(f)].
  - i. 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate to the conditions at the site, shall be used to determine VOM concentration. Method selection shall be based on consideration of the diversity of organic species present and their total concentration and on consideration of the potential presence of interfering gases. The test shall consist of three separate runs, each lasting a minimum of 60 minutes, unless the Illinois EPA and the USEPA determine that process variables dictate shorter sampling times.
  - ii. 40 CFR Part 60, Appendix A, Method 1 or 1A, shall be used for sample and velocity traverses.
  - iii. 40 CFR Part 60, Appendix A, Method 2, 2A, 2C or 2D, shall be used for velocity and volumetric flow rates.





## GE ENERGY SERVICES

GE Mostardi Platt  
888 Industrial Drive  
Elmhurst, Illinois 60126  
Ph: 630-530-6600, Fax: 630-530-6630

### PERMENANT TOTAL ENCLOSURE VERIFICATION

*Performed At*

**Rollprint Packaging Products, Inc.  
Ultra Lam Enclosure  
Addison, Illinois**

*Test Dates*

**September 16, 2002**

*Report No.*

**GE Mostardi Platt Report 20020716  
Revision 0**

*Report Submittal Date*

**October 31, 2002**



## TABLE OF CONTENTS

CERTIFICATION SHEET .....	i
1.0 INTRODUCTION.....	1
1.1 Project Contact Information.....	1
2.0 METHOD 204 NOMENCLATURE .....	2
3.0 ENCLOSURE CRITERIA AND TECHNIQUES (PTE) .....	2
3.1 NDO Distance to Emitting Point (PTE) .....	2
3.2 Total NDO Area (PTE) .....	2
3.3 Velocity of Air Flow through NDO (PTE).....	2
3.4 Direction of Air Flow through NDO (PTE) .....	3
4.0 EVALUATION RESULTS (PTE).....	3
4.1 Equivalent Diameters: NDO to VOC Emitting Point (PTE) .....	3
4.2 NDO to Enclosure Area Ratio (PTE) .....	3
4.3 NDO Facial Velocity Determinations (PTE) .....	4
4.4 NDO Air Flow Direction (PTE) .....	4
5.0 CONCLUSION.....	4
APPENDIX .....	
Enclosure Scale Drawing (Figure 1) .....	6
Method 204 Field Data.....	7



### CERTIFICATION SHEET

Having reviewed the test program described in this report, I hereby certify the data, information, and results in this report to be accurate and true according to the methods and procedures used.

Data collected under the supervision of others is included in this report and is presumed to have been gathered in accordance with recognized standards.

GE MOSTARDI PLATT

A handwritten signature in cursive script that reads "Scott W. Banach".

---

Scott W. Banach  
Director, Project Engineering

**PERMANENT TOTAL ENCLOSURE VERIFICATION**

Performed For  
**ROLLPRINT PACKAGING PRODUCTS, INC.**  
At The  
**Ultra Lam Enclosure**  
**Addison, Illinois**  
**September 16, 2002**

---

**1.0 INTRODUCTION**

An evaluation of the Ultra Lam enclosure as a Permanent Total Enclosure (PTE) was conducted by GE MOSTARDI PLATT, a division of GE Energy and Industrial Services, Inc. (GE Mostardi Platt) on September 16, 2002. The evaluation was authorized by and performed for Rollprint Packaging Products, Inc.

The purpose of this evaluation was to determine if the PTE enclosure housing the Coater Laminator Station meets the criteria of a total enclosure as detailed by United States Environmental Protection Agency (USEPA) Method 204, Title 40, *Code of Federal Regulations*, Part 51 (40CFR51), Appendix M.

An enclosure is evaluated against a set of criteria. If the criteria are met and if all the exhaust gases are vented to a control device, the AWS Oxidizer, then the volatile organic compounds (VOC) capture efficiency (CE) is assumed to be 100 percent and CE need not be measured. This then qualifies as a PTE.

**1.1 Project Contact Information**

Location	Address	Contact
Test Facility	Rollprint Packaging Products, Inc. 320 Stewart Avenue Addison, Illinois 60101-3375	Mr. Mark E. Pederson (630) 628-1700 MarkPederson@Rollprint.com
Testing Company Representative	GE Mostardi Platt 888 Industrial Drive Elmhurst, Illinois 60126	Mr. Jeffrey M. Crivlare Senior Project Manager (630) 530-6610 (phone) (630) 530-6630 (fax) jeffrey.crivlare@ps.ge.com



The tests were conducted by Messrs. W. Yap and J. Crivlare of GE Mostardi Platt.

## 2.0 METHOD 204 NOMENCLATURE

A PTE is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

A Natural Draft Opening (NDO) is defined as any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.

## 3.0 ENCLOSURE CRITERIA AND TECHNIQUES (PTE)

### 3.1 NDO Distance to Emitting Point (PTE)

Criteria: All NDOs such as open doorways, windows, etc. must be at least four equivalent NDO diameters from the nearest potential VOC emitting point.

Technique: The dimensions of all NDOs and distances to potential emitting points are measured. The calculated NDO equivalent diameters are compared to the emitting point distances measured.

### 3.2 Total NDO Area (PTE)

Criteria: The area of all NDOs divided by the total area of all walls, floors and ceilings in the enclosure (called the "NEAR" ratio in the procedure) must not exceed 0.05.

Technique: Actual measurements were used to determine a composite surface area of the enclosure and the normally open NDOs and the NEAR ratio was determined.

### 3.3 Velocity of Air Flow through NDO (PTE)

Criteria: The calculated face velocity through the NDOs must be greater than 200 feet per minute (fpm). This is defined as the total exhaust volume (in scfm), less make up air, divided by the area of all NDOs (in square feet).

Technique: The static pressure of the PTE is measured to determine if it meets the - 0.007 inches H<sub>2</sub>O criteria.





### 3.4 Direction of Air Flow through NDO (PTE)

Criteria: The direction of air flow through all NDOs must be into the enclosure.

Technique: Smoke tubes were used at each normally open NDO to measure the direction of the air flow. A record of this data was made on the Procedure T data sheet, appended.

## 4.0 EVALUATION RESULTS (PTE)

The enclosure must meet all of the following four (4) (PTE) requirements to qualify as a PTE. As currently configured the Ultra Lam enclosure geometry compares to Method 204 criteria as follows:

### 4.1 Equivalent Diameters: NDO to VOC Emitting Point (PTE)

A list of minimum and current NDO to VOC emitting point distances are listed below:

NDO No.	NDO	Area in <sup>2</sup>	Equivalent Diameter	VOC Emission Point	Distances		Pass/Fail?
					Minimum	Actual	
1	Door	160.75	14.3"	Coating Pan	57.2"	158"	Pass
2	Door	119.5	12.3"	Coating Pan	49.3"	130"	Pass
3	Door	153.88	14.0"	Coating Pan	56.0"	106"	Pass
4	Product In (top)	214.0	16.5"	Coating Pan	66.0"	85"	Pass
5	Product In (top middle)	214.0	16.5"	Coating Pan	66.0"	68"	Pass
6	Product In (bottom middle)	107.0	11.67"	Coating Pan	46.7"	48"	Pass
7	Product In (bottom)	107.0	11.67"	Coating Pan	46.7"	51"	Pass

$$\text{Equivalent Diameter} = \left( \frac{4 \times \text{area}}{\pi} \right)^{0.5}$$

Minimum Allowed Distance = 4 × Equivalent Diameter (NDO)

### 4.2 NDO to Enclosure Area Ratio (PTE)

The calculated NEAR ratio of the room is 0.0040. The calculation is as follows:



where:  $A_N/A_T \leq 0.05$

$A_N$	= Area of normally open NDOs	=	7.47 ft <sup>2</sup>
$A_T$	= Total Area of enclosure	=	1857.9 ft <sup>2</sup>
$\therefore$	$A_N 7.47 \div A_T 1857.9$	=	0.0040 ft <sup>2</sup>

Because the calculated NEAR is less than the maximum allowable ratio of 0.05, the enclosure meets the requirements of this section.

#### 4.3 NDO Facial Velocity Determinations (PTE)

The static pressure of the PTE was measured using a micromanometer. The negative pressure in the enclosure was -0.008 inches H<sub>2</sub>O. This meets the -0.007 inches H<sub>2</sub>O criteria.

#### 4.4 NDO Air Flow Direction (PTE)

The air flow, verified using smoke tubes, through all of the normally open NDOs is into the enclosure.

### 5.0 CONCLUSION

Based on test program data, all access doors and windows being closed and all the VOC emissions captured and contained by discharge through the AWS Oxidizer control device, the current configuration of the Ultra Lam enclosure meets all of the minimum USEPA criteria for a PTE.

## APPENDIX

# Rollprint Packaging Products, Inc.

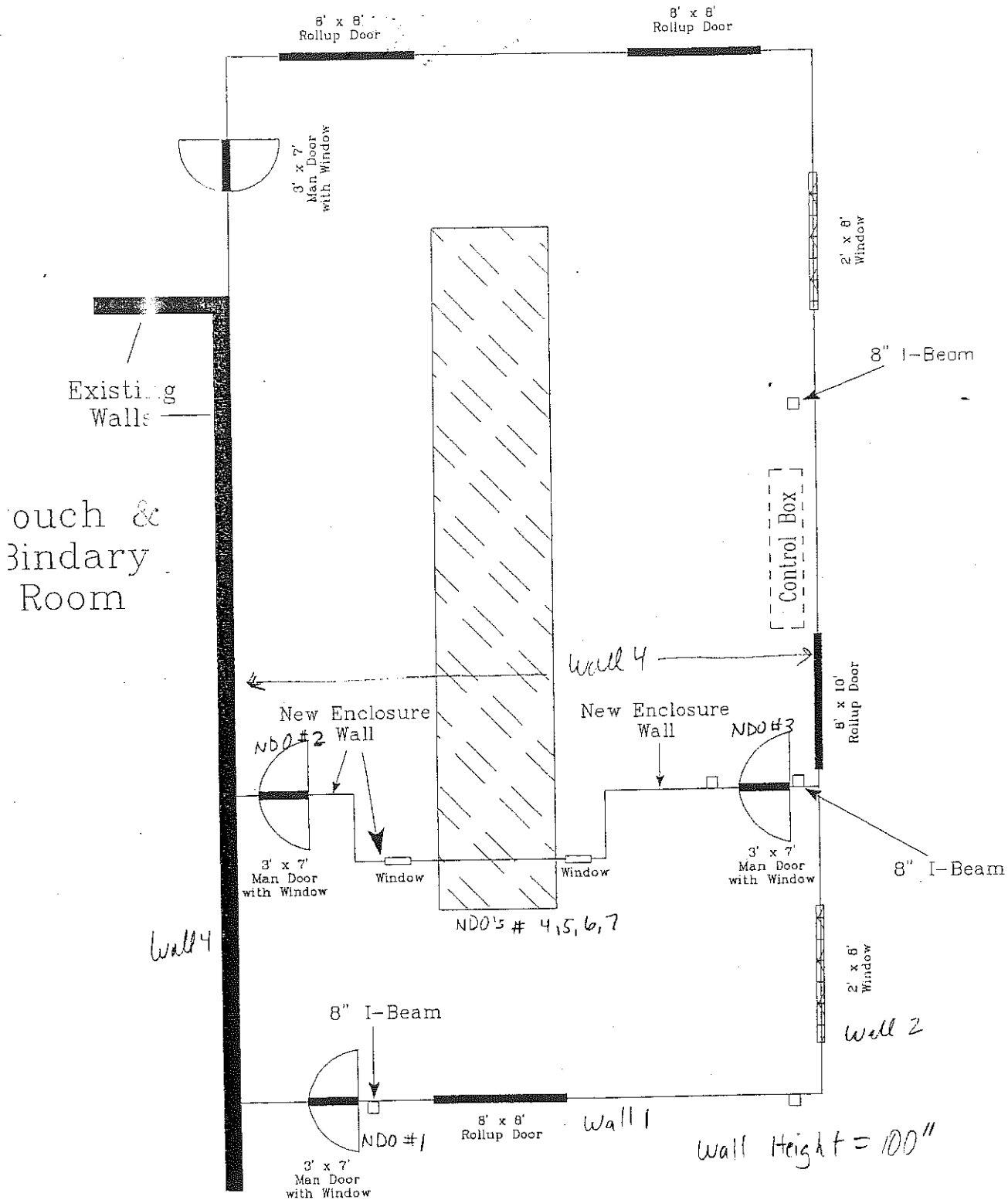


Figure 1  
Modified PTE for Ultra-Lam

# PROCEDURE T DATA SHEET

Pr Rollprint Packaging Products Inc  
 Lo a: \_\_\_\_\_  
 Date: 9/16/02

Sketch enclosure, all ducts, NDOs and potential  
 VOC emission points on accompanying page.  
 Label all dimensions.

Enclosure Designation: Ultra Lamin DTE  
 Control Devices (s): AWS Oxidizer

Process(es) Enclosed: Croster Laminator Station

## NDO to VOC Emission Point

NDO	Dimensions	A R E A Inches <sup>2</sup>	Equivalent Diameter Inches	VOC Emission Point	Distances		Pass/ Fail?
					Minimum	Actual	
DOOR	RM	160.75	14.3	Coating Pan	57.2"	150"	Pass
DOOR	attached	119.5	12.3	Coating Pan	49.3"	130"	Pass
DOOR	Sheds	152.85	14.0	Coating Pan	56.0"	106"	Pass

$$\text{NDOs equivalent diameter} = \left( \frac{4 \times \text{area}}{\pi} \right)^{0.5}$$

Minimum Allowed Distance = 4 × Equivalent Diameter (NDO)

## NDO to Exhaust (TTE only) (N/A)

Exhaust Point	Dimensions	Equivalent Diameter	NDO	Dimensions	Equivalent Diameter	Distances		Pass/ Fail?
						Minimum	Actual	

$$\text{Equivalent diameter} = \left( \frac{4 \times \text{area}}{\pi} \right)^{0.5}$$

Minimum Allowed Distance = 4 × Equivalent Diameter (NDO or Exhaust Point)



# PROCEDURE T DATA SHEET

P: \_\_\_\_\_  
 Location: \_\_\_\_\_  
 Date: \_\_\_\_\_

Sketch enclosure, all ducts, NDOs and potential  
 VOC emission points on accompanying page.  
 Label all dimensions.

Enclosure Designation: \_\_\_\_\_  
 Control Devices (s): \_\_\_\_\_

Process(es) Enclosed: \_\_\_\_\_

## NDO to VOC Emission Point

NDO	Dimensions	A R E A	Equivalent Diameter	VOC Emission Point	Distances		Pass/ Fail?
					Minimum	Actual	
1 - Product	(Top) 4" x 53.5"	214.0	16.5"	Coating Pan	66.0"	85"	Pass
5 - Product	(T/middle) 4" x 53.5"	214.0	16.5"	Coating Pan	66.0"	68"	Pass
6 - Product	(B/m) 2" x 53.5"	107.0	11.67"	Coating Pan	46.7"	48"	Pass
7 - Product	(Bottom) 2" x 53.5"	107.0	11.67"	Coating Pan	46.7"	51"	Pass

$$\text{NDOs equivalent diameter} = \left( \frac{4 \times \text{area}}{\pi} \right)^{0.5}$$

Minimum Allowed Distance = 4 x Equivalent Diameter (NDO)

## NDO to Exhaust (TTE only) (N/A)

Exhaust Point	Dimensions	Equivalent Diameter	NDO	Dimensions	Equivalent Diameter	Distances		Pass/ Fail?
						Minimum	Actual	

$$\text{Equivalent diameter} = \left( \frac{4 \times \text{area}}{\pi} \right)^{0.5}$$

Minimum Allowed Distance = 4 x Equivalent Diameter (NDO or Exhaust Point)

NDO #1

Area (Sq. Inches)

$$0.375" \times 84" = 31.5$$

$$1" \times 36" = 36.0$$

$$4" \times 3" = 12.0$$

$$0.5" \times 73" = 36.5$$

$$2.5" \times 3.5" = 8.75$$

$$1" \times 36" = 36.0$$

---

160.75 Sq. Inches.

NDO #2

Area (Sq. Inches)

$$0.5" \times 83.5" = 41.75$$

$$0.5" \times 36" = 18.0$$

$$0.5" \times 83.5" = 41.75$$

$$0.5" \times 36" = 18.0$$

---

119.50 Sq. Inches.

NDO #3

Area (Sq. Inches)

$$0.5" \times 83.5" = 41.75$$

$$1" \times 36" = 36.0$$

$$0.75" \times 83.5" = 62.63$$

$$0.375" \times 36" = 13.5$$

---

153.88 Sq. Inches

## PROCEDURE T DATA SHEET (cont.)

### NEAR Ratio [NDO Area/Total Enclosure Area]

NDO	Surface Area ( <del>FT</del> ) In <sup>2</sup>	Wall, Ceiling, or Floor Section	Surface Area (FT <sup>2</sup> )
1	160.75	Wall 1	425" x 100" = 295.1
2	119.5	2	171" x 100" = 113.8
3	153.88	3	425" x 100" = 295.1
4	214.0	4	199" x 100" = 138.2
5	214.0	Floor	152" x 425" =
6	107.0		47" x 78" =
7	107.0		28" x 160" = 505.2
		Ceiling	505.2
	1076.13 In <sup>2</sup>		
TOTAL NDO AREA = 7.47 ft <sup>2</sup>		TOTAL ENCLOSURE AREA = 1857.9	

NEAR ratio:

$$\frac{\text{NDO Area}}{\text{Enclosure Area}} = \frac{7.47}{1857.9} = 0.0040$$

Allowable NEAR ratio  $\leq 0.05$ ,

Pass/Fail? Pass

### Velocity of Air through NDO

Exhausted Air			Make Up Air	
Exhaust Point	SCFM	Controlled? (Y/N?)	Make up point	SCFM
TOTAL			TOTAL	

total NDO area - \_\_\_\_\_ ft<sup>2</sup>  
(from section 5.2)

$$\frac{\text{Exhaust scfm} - 1 \text{ make up scfm}}{\text{NDO area (ft}^2\text{)}} = \text{_____ fpm}$$

fpm should be  $\geq 200$

pass/fail? \_\_\_\_\_

bottom Product to NDO open / No AC - 0.012"  
 bottom Product to NDO open / AC on - 0.010"  
 all four NDO's open / AC on - 0.008"

## PROCEDURE T DATA SHEET (cont.)

### Direction of Air through NDO

Method used to check direction of airflow:

☒ Smoke Tubes

☐ Velometer

☐ Plastic Strips

☐ Other: \_\_\_\_\_

NDO	No.	Normally		Direction of Air Flow			NDO Required to be Normally Closed?	All Points?*
		Open	Closed	Into Enclosure	Out of Enclosure	Swirled		
1		✓		✓			No	✓
2		✓		✓			No	✓
3		✓		✓			No	✓
4		✓		✓			No	✓
5		✓		✓			No	✓
6		✓		✓			No	✓
7		✓		✓			No	✓

\*Check to verify that airflow was checked at top, bottom, middle, and both sides of enclosure.

### Status of doors and windows

Are all access doors and windows whose areas are not included as NDOs closed during normal operation.

☒ Yes ☐ No

### Capture of VOC Emissions

Does all exhaust ductwork go to control (for PTE) or to a point where it can be measured (for TTE).

☒ Yes ☐ No

## Site Information for Rollprint Packaging Products, Inc. (00-518-3298)

<b>Business Name:</b>	Rollprint Packaging Products, Inc.
<b>Tradestyle:</b>	
<b>Second Tradestyle:</b>	
<b>D&amp;B D-U-N-S Number:</b>	00-518-3298
<b>Location Type:</b>	HEADQUARTERS
<b>Primary SIC Code:</b>	26710000
<b>Primary SIC Description:</b>	PAPER; COATED AND LAMINATED PACKAGING
<b>Physical Street Address:</b>	320-345 Stewart Ave
<b>Second Address Line:</b>	
<b>Physical City:</b>	Addison
<b>State / Province Name:</b>	Illinois
<b>Physical State / Province Abbreviation:</b>	IL
<b>Physical Zip / Postal Code:</b>	60101
<b>County Name:</b>	DU PAGE
<b>Country Name:</b>	USA
<b>Mail Address:</b>	320-345 Stewart Ave
<b>Second Mail Address Line:</b>	
<b>Mail City:</b>	Addison
<b>Mail State / Province:</b>	IL
<b>Mail Zip / Postal Code:</b>	60101
<b>Telephone Number:</b>	6306281700
<b>Fax Number:</b>	
<b>Employees Here:</b>	160
<b>Employees Total:</b>	180
<b>Sales Volume:</b>	\$21,540,571.00
<b>Percent Growth Employees (3yr) with sign:</b>	0%
<b>Percent Growth Sales (3yr) with sign:</b>	0%
<b>Latitude with sign:</b>	0
<b>Longitude with sign:</b>	0
<b>Public/Private Indicator:</b>	PRIVATE COMPANY
<b>Square Footage:</b>	0
<b>CEO Full Name:</b>	Robert K Dodrill
<b>CEO Title:</b>	President
<b>Global Ultimate D&amp;B D-U-N-S Number:</b>	00-518-3298
<b>Global Ultimate D&amp;B Business Name:</b>	Rollprint Packaging Products, Inc.
<b>Domestic Ultimate D&amp;B D-U-N-S Number:</b>	00-518-3298
<b>Domestic Ultimate D&amp;B Business Name:</b>	Rollprint Packaging Products, Inc.
<b>Parent D&amp;B D-U-N-S Number:</b>	00-000-0000
<b>Headquarters D&amp;B D-U-N-S Number:</b>	00-518-3298
<b>Parent/HQ Name:</b>	Rollprint Packaging Products, Inc.
<b>Parent/HQ State / Province:</b>	IL
<b>Number of Family Members:</b>	2



# August 11, 2004 Opportunity to Confer Meeting

Jamie Paulin  
paulin.jamie@epa.gov

U.S. EPA RCRA

312-886-1771

Michael Berman  
MARK PETERSON

MPETERSON@ROLLPRINT.COM

U.S. EPA ORC  
Office of Regional  
Counsel

312-886-6837

ROLLPRINT PACKAGING PROD

(630) 628-1700

DHUANNE DODRILL

dhuanne@rollprint.com

ROLLPRINT PACKAGING PRODUCTS

630-628-1700



Mark Pederson  
<markpederson@rollprint .com  
>

To  
Subject Notice of Intent to File

07/14/2004 09:32 AM

Jamie, I am responding to your phone message in regards to the receipt of the above mentioned letter. I will be in touch with you either Thursday July 22, or Friday July 23 to schedule a meeting with US EPA. If you need anything else, please advise.

Mark Pederson, EHS Manager  
Rollprint Packaging Products, Inc.  
630-628-1700 x-3322





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

**JUL 09 2004**

DE-9J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mark Pederson  
Environmental/Health & Safety Officer  
Rollprint Packaging Products, Inc.  
320 South Stewart Ave. / 335 South Stewart Ave.  
Addison, Illinois 60101

RE: Pre-filing Notice and Opportunity to Confer  
Rollprint Packaging Products, Inc. - Addison, Illinois Facilities  
ILD 984 766 642  
ILR 000 049 429

Dear Mr. Pederson:

This letter is to notify you that the United States Environmental Protection Agency (U.S. EPA) is prepared to file an administrative complaint for civil penalties against Rollprint Packaging Products, Inc. (Rollprint). We are offering Rollprint an opportunity to confer with us in advance of our filing a complaint.

On October 30, 2002, the U.S. EPA conducted a compliance evaluation inspection of the hazardous waste management at Rollprint located at 320 South Stewart Ave. and 335 South Stewart Ave., Addison, Illinois 60101. In addition, on July 14, 2003, the U.S. EPA conducted a compliance evaluation follow up inspection at these same locations. Based on information collected during both of these inspections, and documents provided by Rollprint in response to information requests from U.S. EPA, U.S. EPA has determined that Rollprint may have violated certain requirements of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901 et seq., as amended. These violations include the following:

1. Violation of the requirements of 35 IAC §§ 702.120, 702.123, 703.150(a) 703.180, and 703.181 [40 C.F.R. §§ 270.10(a) and (e); and 270.13], by failing to file the proper permit application for a hazardous waste storage permit within 30 days after its first noncompliance with any condition for an exemption from a permit in 35 IAC § 722.134 [40 CFR § 262.34].
2. Violation of 35 IAC § 725.152(c) [40 CFR § 265.52(c)] by not describing arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services within the contingency plan.

3. Violation of 35 IAC § 725.273(a) [40 CFR § 265.173(a)] when several satellite accumulation containers were not closed when not in use on two separate occasions.
4. Violation of 35 IAC § 725.131 [40 CFR § 265.31] by not minimizing the possibility of fire, explosion or any unplanned sudden or non-sudden release of hazardous waste.
5. Violation of 35 IAC § 722.134(d)(5)(B)(i) [40 CFR § 262.34(d)(5)(ii)(A)] by not posting the name and telephone number of the emergency coordinator next to the telephone.
6. Violation of 35 IAC § 722.134(d)(5)(B)(ii) [40 CFR § 262.34(d)(5)(ii)(B)] by not posting the location of fire extinguishers and spill control material next to the telephone.

Based on relevant liability and penalty information available to us, for the violations cited above, we plan to propose a civil penalty of approximately \$28,000 in a civil administrative complaint under Section 3008 of RCRA, 42 U.S.C. § 6928, as adjusted under the Civil Monetary Penalty Inflation Adjustment Rule, published at 40 C.F.R. Part 19, and with reference to the U.S. EPA's RCRA Civil Penalty Policy. This potential penalty reflects our preliminary view of the gravity and duration of the violation, without regard to the adjustment factors discussed below and in the RCRA Civil Penalty Policy. The final penalty we propose in the complaint may differ from this figure, based upon our consideration of any relevant new information Rollprint provides, and upon our further consideration of the penalty policy's adjustment factors.

This letter is not a demand to pay a penalty. We will not ask Rollprint to pay a penalty until we file the complaint or a final order. Before filing the complaint, we are giving Rollprint the opportunity to present any information that it believes we should consider regarding its liability for these violations and an appropriate penalty for them. Rollprint may present this information in writing or in a meeting with U.S. EPA representatives. Relevant information regarding liability might include evidence that Rollprint did not violate the law or evidence that we identified the wrong party.

Rollprint may also present information that Rollprint believes is relevant to the amount of a proposed penalty. Under RCRA, we are required to consider the seriousness of the violation and any good faith efforts Rollprint made to comply with the requirement violated. Factors relevant to the seriousness of the violation include, but are not limited to, the risks of exposure to hazardous wastes from the violation, the potential seriousness of contamination that could have resulted from the violation, the extent to which your company deviated from the requirement, and how many days the violation lasted.

The RCRA Civil Penalty Policy "adjustment factors" relevant to penalty include: (1) any good faith efforts Rollprint made to comply with the requirement violated, (2) the expenses Rollprint delayed or avoided by not complying with the requirement(s), (3) the degree to which the violation was willful, (4) whether Rollprint has a prior history of not complying with RCRA, (5) financial inability to pay, and (6) other unique factors. Information relevant to good faith efforts to comply with the requirement(s) may include, for example, records documenting actions Rollprint took to comply prior to the time that U.S. EPA or another governmental agency first discovered the violations in this case.



Additionally, if Rollprint notifies us that it may be financially unable to pay a proposed penalty amount, we will consider its ability to pay prior to finalizing our penalty proposal, provided that Rollprint submits to us required financial documentation to support such a claim. If Rollprint believes that it may be financially unable to pay a proposed penalty amount, Rollprint should provide us certified financial statements, including balance sheets and tax returns with all schedules, for the past three years. We will not consider an "ability to pay" claim without this financial information.

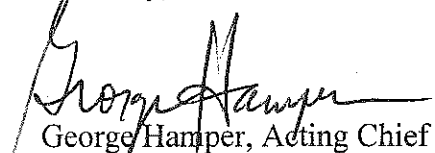
Rollprint may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information Rollprint submits to us. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If Rollprint fails to assert a business confidentiality claim, U.S. EPA may make all submitted information available, without further notice, to any member of the public who requests it.

If Rollprint chooses to respond to this letter or to confer with us, you should contact Jamie Paulin, of the Enforcement and Compliance Assurance Branch, in writing within ten business days of its receipt of this Notice. Please be advised that this conference is not a settlement negotiation covered by Federal Rule of Evidence 408; we may use any information Rollprint submits in support of an administrative, civil or criminal action. At the conclusion of the conference or thereafter (or after Rollprint has completed a written reply if it does not wish to have a conference), we may give Rollprint the opportunity to engage in settlement negotiations before we file the complaint. In the event that pre-filing settlement negotiations commence and are successful, a settlement agreement can be filed simultaneously with the complaint, under Agency regulations at 40 CFR 22.13(b).

If Rollprint decides not to respond to this letter or to confer with us, U.S. EPA may proceed with enforcement action against Rollprint as authorized under Sections 3008(a) of RCRA, 42 U.S.C. §§ 6928(a), including the assessment of appropriate civil penalties.

A copy of the document titled "U.S. EPA Small Business Resources" is enclosed for your reference. If Rollprint has any technical questions regarding the alleged violations, please contact Ms. Paulin at (312) 886-1771. Rollprint should direct legal inquiries to Michael Berman, Office of Regional Counsel, at (312) 886-6837.

Sincerely,



George Hamper, Acting Chief  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division

Enclosure: U.S. EPA Small Business Resources

cc: Todd Marvel, Illinois EPA



## Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist  
☐ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☐ Information Request  
☒ Pre-Filing and Opportunity to Confer  
☐ State Notification of Enforcement Action

Facility Name: Rollprint Packaging Products Inc.

Facility Location: 320 S. Stewart Ave / 335 S. Stewart Ave.

City: Addison State: IL 60101

U.S. EPA ID# ILD 984 766 642 / IL R 000 049 429

Assigned Staff Samie Paulin Phone: 312-886-1721

Name	Signature	Date
Author	<i>Samie Paulin</i>	6/30/04
Assoc. Regional Counsel	<i>M. Bern</i>	6/30/04
Section Chief	<i>Paul D. Longuey CS/7/6/7/1/04</i>	6/30/04
Branch Chief	<i>George H. Humpal for IMO</i>	7-8-04

### Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
  - One copy for the assigned staff;
  - One copy for the section file;
  - One copy for the branch file; and
  - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.  
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

cc: Mike Burman, OKC

Along with Rollprint, U.S. EPA would like to resolve this matter as quickly as possible in an agreed settlement.

Thank you for your interest in this issue. If I can be of further assistance, please contact me.

Sincerely,

Bharat Mathur

Acting Regional Administrator

*Correction was made  
by ORA*



Along with Rollprint, U.S. EPA would like to resolve this matter as quickly as possible in an agreed settlement.

Thank you for your interest in this issue. If I can be of further assistance, please contact me.

Sincerely,

Bahrat Mathur  
Acting Regional Administrator

myc 9/30/04







March 9, 2004

Jamie Paulin  
U.S. EPA  
77 West Jackson Boulevard, DE-9J  
Chicago, IL 60604-3590

Re: Section 3007 Request for Information

Dear Jamie

This submittal is in response to the above referenced information request.

Request 1. The following people were consulted in preparing answers to this request for information – All can be reached at (630) 628-1700

Mark Thoms – Maintenance Supervisor – 17 yrs  
Bob Ferencz – Human Resources Manager – 11 yrs  
Joe Miceli – Vice President of Manufacturing – 23 yrs  
Mark Pederson – EHS Manager – 7 years

Request 2. An inspection log of the hazardous waste storage areas dated from July 2003 to February 2004 is attached as Attachment 1. Also, included in the attachment are the inspections logs for the dates (weeks) listed in Request # 2 as having been identified as missing during the October 30, 2000 inspection of Rollprint.

Request 3. Rollprint did identify the location of emergency communication, which is within 15 feet of the storage area. The shipping department, located adjacent to the storage area has several phones available for immediate access and a fire alarm pull station within immediate access, which meets the requirement of Section 265.34. The rule does not explicitly state that the emergency communication device has to be at the fire door.

The door handle on the inside of the fire door is one that is recessed, such that a new door handle is not required. See Attachment 2.

Rollprint Packaging Products purchased this facility in 1981. According to our Maintenance Supervisor, there is no available documentation describing how the fire door fusible link activates. As initially communicated, if a fire were to occur near the door, the linkage, which is fusible, would melt away, thus activating the closure of the door. The door also automatically closes upon power outage.

Request 4. Rollprint's contingency plan did state that there are arrangements established with the police, fire department and hospital. The plans were distributed to the appropriate organizations as required. Also, each of these organizations has toured the facility in the past. Rollprint Packaging Products does not utilize emergency response contractors, as the Addison Fire Department has its own Hazardous Materials Response Team.

The item of issue is that the actual written agreements needed to be attached to the contingency plan. Included in Attachment 3 is the updated Contingency Plan which includes the written agreement from the Addison Fire Protection District and the Addison Clinic. The Addison Police Department does not provide these agreements in writing. If the US EPA wishes more information, they may contact the police department themselves. The appropriate contact is Commander Bill Babyar at (630) 693-7906. The Addison Clinic is more familiar with Rollprint Packaging Products facilities, is located much closer to the facilities and therefore is more likely to assist in any emergency than Elmhurst Hospital. However, the contingency plan is still provided to Elmhurst Hospital for their records. No documented agreement exists with Elmhurst Hospital.

Request 5. Rollprint Packaging Products conducts on-the job individual training for all of its employees involved with the generation and handling of hazardous waste. The Emergency Coordinator, along with the team leaders, are not involved with the generation and management of hazardous waste, but are reminded of their duties in cases of emergency. The Emergency Coordinator maintains a copy of the Contingency Plan, and is reviewed with him on a yearly basis. This is however not documented.

The main function of the Emergency Coordinator and Team Leaders in responding to emergencies is to make sure the building is evacuated and shutting off electrical power as necessary. Rollprint Packaging Products Emergency Coordinator and Team Leaders or any of its employees, do not respond to large spills, fires or other types of emergencies. The alarm system set up within the facility is directly tied to a dispatch center which then notifies the police and fire departments. See the attached contract with NORCOM Safety & Security, Attachment 4. Since training of these individuals in hazardous waste management is an issue, the team members names will be removed from the Contingency Plan and only the Emergency Coordinator's name will be listed. The Emergency Coordinator is aware of and familiar with this plan. However, we do have training documentation for Joe Miceli, the backup Emergency Coordinator. He attends official classroom training on a bi-annual basis, as he serves as a backup to the EHS Manager for signing off on manifested

hazardous waste shipments. The off year is typically an informal discussion on the contingency plan and any new regulatory developments.

2. Request 6. Attachment 5 is a picture of our satellite accumulation drums with the appropriate marking.

2. Request 7. Attachment 6 is a copy of the LDR form that accompanied manifest WIK231840. As a reminder to the regulations, the LDR form is no longer required for each shipment. I have several other LDR forms available from previous shipments that have the appropriate wastewater/non-wastewater category completed. Our processes that generate hazardous waste do not change, thus a new LDR submission is not warranted.

✓ Request 8. Attachment 7 is a picture of our posting of the Emergency Coordinator's phone number and map of the manufacturing area identifying the location of fire alarms, fire extinguishers and spill control equipment. next to the phone located at 335 S Stewart Ave. Included in the attachment is the entire building layout, of which only the area of the extruder is posted near the phone.

✓ Request 9. Attachment 8 is the certification as required

If you have any additional questions, please call me at (630) 628-1700.

Sincerely



Mark E. Pederson  
Environmental, Health & Safety Manager

cc: Dhuanne Dodrill, Executive VP w/o Attachment

encl.

ATTACHMENT 1

REQUEST # 2



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 5/8/02 Time: 1:00 PM

Name of Inspector: Mark Peterson

Number of Containers	Type
<u>8</u>	<u>Drums</u>
_____	_____
_____	_____

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 4/24/02

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 5/24/02 Time: 1:20pm

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>12</u>	<u>DRUMS</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 4/24/02

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson





## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 5/29/02 Time: 11:00 am

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>13</u>	<u>Drums</u>
<u>          </u>	<u>          </u>
<u>          </u>	<u>          </u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 4/24/02

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 6/12/02 Time: 2:00 pm

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>17</u>	<u>DM</u>
<u>          </u>	<u>          </u>
<u>          </u>	<u>          </u>

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers
- ☒ All containers closed
- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Oldest start date: 4/24/02
  - Words "Hazardous Waste" on each container
- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials
- ☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line
- ☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 7/10/02 Time: 1:30 pm

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>6</u>	<u>DM</u>

- ☒ All containers in good condition
- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

- ☒ All containers closed

- ☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

- Oldest start date: 6/27/02 MEP 7/10/02

- ☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

- ☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

- ☒ No incompatible wastes together.

Description of any problems found and actions taken:

☐ None

Signature: Mark E Pederson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 7/24/02 Time: 9:45 am

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>11</u>	<u>DM</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers
- ☒ All containers closed
- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Oldest start date: 6/24/02
  - Words "Hazardous Waste" on each container
- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials
- ☒ Ignitable and reactive waste  $\geq 15$  m. or 50 feet from property line
- ☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 8/8/02 Time: 2:00 pm

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>15</u>	<u>DRUMS</u>
_____	_____
_____	_____

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers
- ☒ All containers closed
- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Oldest start date: 6/24/02
  - Words "Hazardous Waste" on each container
- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials
- ☒ Ignitable and reactive waste  $\geq 15$  m. or 50 feet from property line
- ☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: Mark E Pederson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 8/22/2002 Time: 9:30 am

Name of Inspector: Mark Pedersen

Number of Containers	Type
<u>20</u>	<u>DM</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 6/24/02

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pedersen





## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 9/11/02 Time: 3:30 PM

Name of Inspector: Mark Pederson

Number of Containers	Type
<u>0</u>	<u>—</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date:                     

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 9/19/02 Time: 12:00 pm

Name of Inspector: MARK PETERSON

Number of Containers	Type
<u>3</u>	<u>DM</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers

☒ All containers closed

- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Oldest start date: 9/12/02
  - Words "Hazardous Waste" on each container

- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials

☒ Ignitable and reactive waste  $\geq 15$  m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 10/2/02 Time: 8:45 am

Name of Inspector: Mark Pederson

Number of Containers	Type
<u>6</u>	<u>DM</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 9/12/02

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson



320 BLDG

## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: JULY 2, 2003 Time: 1:00 pm

Name of Inspector: MARK PEDERSON

Number of Containers      Type

5      DM- WASTE OIL

12      DM- HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 5/19/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☐ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E. Pederson



335 BLDG.

## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: July 2, 2003 Time: 1:00 pm

Name of Inspector: Mark Pederson

Number of Containers	Type
<u>7</u>	<u>DM</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 7/7/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson



320 BLDG

## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: JULY 8, 2003 Time: 9:00amName of Inspector: MARK PEDERSON

Number of Containers Type

12 DM-HAZARDOUS WASTE5 DM-WASTE OIL☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 5/19/03☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ NoneSignature: Mark E Pederson



335 BCDG



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 7/8/03 Time: 9:00am

Name of Inspector: \_\_\_\_\_

Number of Containers Type

7 DM-HAZARDOUS WASTE

\_\_\_\_\_

\_\_\_\_\_

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 4/17/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: \_\_\_\_\_

Mark E. Pederson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 7/16/03 Time: 3:45 pm

Name of Inspector: MARK PETERSON

Number of Containers      Type

5      DM - HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 7/1/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

ONE DRUM LEAKING, BUNG NEEDS TO BE TIGHTENED

Signature: Mark E Peterson

335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 7/16/03 Time: 3:45 pm

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>0</u>	<u>—</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date:                     

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E. Pederson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 7/23/03 Time: 9:45 am

Name of Inspector: MARK PEDERSON

Number of Containers 6 Type DM - HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 7/1/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 7/23/03 Time: 9:45 am

Name of Inspector: Mark Peterson

Number of Containers	Type
<u>0</u>	<u>  </u>
<u>  </u>	<u>  </u>
<u>  </u>	<u>  </u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date:                     

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E. Peterson



320 BLDG

## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 7/30/03 Time: 11:25 am

Name of Inspector: MARK PETERSON

Number of Containers 8 Type DM-HAZ WASTE

☒ All containers in good condition  
• No evidence of corrosion (e.g.,  
pitting or severe rust/deterioration  
other than minor surface discoloring)

• No evidence of leaks  
• Containers not dented, crushed or  
punctured  
• General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

• Start date  
• Words "Hazardous Waste" on each container

• Oldest start date: 7/1/01

☒ Emergency equipment present and in good condition

• Fire extinguishers  
• Hoses

• Alarms  
• Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and  
actions taken:

☒ None

Signature: Mark E Peterson



335. BLDG



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 7/30/03 Time: 11:25 AM

Name of Inspector: Mark Peterson

Number of Containers	Type
<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>
<u>                    </u>	<u>                    </u>

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers
- ☒ All containers closed
- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Oldest start date:
  - Words "Hazardous Waste" on each container
- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials
- ☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line
- ☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: Mark E Peterson

320 BLDG



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 8/6/03 Time: 11:45 AM

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>12</u>	<u>DM-HAZ WASTE</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers
- ☒ All containers closed
- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Oldest start date: 7/1/03
  - Words "Hazardous Waste" on each container
- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials
- ☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line
- ☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

Signature: Mark E Pederson

335-BUDG



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 8/6/03 Time: 11:45 AM

Name of Inspector: Mark Peterson

Number of Containers	Type
_____	_____
_____	_____
_____	_____

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers
- ☒ All containers closed
- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Oldest start date: \_\_\_\_\_
  - Words "Hazardous Waste" on each container
- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials
- ☐ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line
- ☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: AUG 13, 2003 Time: 11:10 AM

Name of Inspector: MARK ROBINSON

Number of Containers 12 Type DM-HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 7/1/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Robinson

335 BLDG



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: AUG 13, 2003 Time: 11:10 AM

Name of Inspector: MARK PEDERSON

Number of Containers      Type

1      DM - HAZ WASTE

\_\_\_\_\_

\_\_\_\_\_

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 8/8/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: Mark E Pederson

320 BLDG



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 8/21/03 Time: 1:30 PM

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>16</u>	<u>DM - HAZ WASTE</u>
<u>1</u>	<u>DM - WASTE OIL</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 7/1/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson



335 BLDG



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 8/21/03 Time: 1:30 pm

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>1</u>	<u>DM- HAZ WASTE</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 8/8/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark Pederson



320 BUILDING

## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 8/27/03 Time: 8:00 am

Name of Inspector: MARIE PEDERSON

Number of Containers	Type
<u>18</u>	<u>DM-HAZ WASTE</u>
<u>1</u>	<u>DM-USED OIL</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 7/1/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Marie Pederson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 8/27/03 Time: 8:00 AM

Name of Inspector: MARC PEDERSON

Number of Containers	Type
<u>1</u>	<u>DM</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 8/8/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Marc E. Pederson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 9/3/03 Time: 1:15 pm

Name of Inspector: MARK PEDERSON

Number of Containers      Type

19      DM- HAZ WASTE

1      DM- WASTE OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 7/1/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 9/3/03 Time: 1:15 pm

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>2</u>	<u>DM</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 8/8/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

320 BUILDING



### WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 9/10/03 Time: 2:00 pm

Name of Inspector: MARK BERSON

Number of Containers	Type
<u>22</u>	<u>DM-HAZ WASTE</u>
<u>1</u>	<u>DM-WASTE OIL</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 7/1/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E. Berson



335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 9/10/03 Time: 2:00pm

Name of Inspector: MARK PETERSON

Number of Containers 5 Type DM- HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 8/8/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☐ None

ONE LABEL NEEDS TO BE REPLACED

Signature: Mark E Peterson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 9/17/03 Time: 2:00 PM

Name of Inspector: \_\_\_\_\_

Number of Containers      Type

2      DM-HAZ WASTE

1      WASTE OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 9/12/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: M. Anderson

335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 9/17/03 Time: 2:00pm

Name of Inspector: MARK PETERSON

Number of Containers	Type
<u>5</u>	<u>DM</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 8/8/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark Peterson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 9/26/03 Time: 7:15am

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>1</u>	<u>DM-USED OIL</u>
<u>7</u>	<u>DM-HAZ WASTE</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 9/12/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

335 BUILDING



# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 9/26/03 Time: 7:15 AM

Name of Inspector: MARK PEDERSON

Number of Containers 60 Type DM-HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 8/8/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 10/1/03 Time: 8:30am

Name of Inspector: MARL PEDERSON

Number of Containers Type

10 DM - HAZ WASTE

2 DM - USED OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 9/12/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: MARL PEDERSON

335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 10/1/03 Time: 8:30 am

Name of Inspector: MARK ROBINSON

Number of Containers	Type
<u>6</u>	<u>DM</u>

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers
- ☒ All containers closed
- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Oldest start date: 8/8/03
  - Words "Hazardous Waste" on each container
- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials
- ☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line
- ☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark Robinson





320 BUILDING

# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: OCT 8, 2003 Time: 1:40pm

Name of Inspector: MARK PEDERSON

Number of Containers      Type

13      DM-HAZ WASTE

3      DM-USED OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 9/12/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark Pederson

335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: OCT 8, 2003 Time: 1:40 pm

Name of Inspector: MARK PETERSON

Number of Containers      Type

7      DM - HAZ WASTE

\_\_\_\_\_

\_\_\_\_\_

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 8/8/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: Mark E Peterson

320 BOICDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 10/14/03 Time: 9:30am

Name of Inspector: \_\_\_\_\_

Number of Containers	Type
<u>4</u>	<u>DM - WASTE OIL</u>
<u>14</u>	<u>DM - HAZ WASTE</u>
_____	_____

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers
- ☒ All containers closed
- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Oldest start date: 9/12/03
  - Words "Hazardous Waste" on each container
- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials
- ☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line
- ☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

Signature: M. E. Peterson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 10/14/03 Time: 10:00 am

Name of Inspector: MARK PEDERSON

Number of Containers Type

7 DM-HAZ WASTE

\_\_\_\_\_

\_\_\_\_\_

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 8/8/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 10/22/03 Time: 1:45 pm

Name of Inspector: MARK PETERSON

Number of Containers Type

16 DM-HAZARDOUS WASTE

5 DM-WASTE OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 9/12/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson

335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 10/22/03 Time: 1:45 pm

Name of Inspector: MARK PEDERSON

Number of Containers 8 Type DM-HAZARDOUS WASTE

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers
- ☒ All containers closed
- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Oldest start date: 8/8/03
  - Words "Hazardous Waste" on each container
- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials
- ☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line
- ☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: Mark E Pederson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 10/30/03 Time: 8:30 am

Name of Inspector: Mark Peterson

Number of Containers	Type
<u>0</u>	<u>—</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date:  

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson



335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 10/30/03 Time: 8:30am

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>0</u>	<u>-</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: \_\_\_\_\_

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson



320 BUILDING

# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/7/03 Time: 8:00 am

Name of Inspector: MARK PEDERSON

Number of Containers      Type

1      DM - 1/2 WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/7/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/7/03 Time: 8:00 am

Name of Inspector: MARK PETERSON

Number of Containers      Type

1      DM-HAZ WASTE

\_\_\_\_\_

\_\_\_\_\_

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 10/31/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: Mark E Peterson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/12/03 Time: 9:10 AM

Name of Inspector: MARK PETERSON

Number of Containers 2 Type DM-HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson

335 BUILDING



# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/12/03 Time: 9:10 am

Name of Inspector: MARK PERSSON

Number of Containers 1 Type DM-HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 10/31/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E. Persson



320 BUILDING

## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/20/03 Time: 1:45 pm

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>5</u>	<u>DM-HAZ WASTE</u>
<u>1</u>	<u>DM-WASTE OIL</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/20/03 Time: 1:45 PM

Name of Inspector: MARK ROBERSON

Number of Containers      Type

1      DM-HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 10/31/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E. Roberson



320 BLDG



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/25/03 Time: 9:30 am

Name of Inspector: MARK PETERSON

Number of Containers Type

6 DM-HAZ WASTE

1 DM-WASTE OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark Peterson



335 BLDG

# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/25/03 Time: 9:30 am

Name of Inspector: MARK PEDERSON

Number of Containers 1 Type DM-HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 10/31/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses
- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

Signature: Mark E Pederson

320 BUILDING



# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 12/3/03 Time: 10:15 am

Name of Inspector: Mark Peterson

Number of Containers Type

7 DM-HAZ WASTE

1 DM-WASTE OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson



335 BUILDING

# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 12/3/03 Time: 10:15 am

Name of Inspector: MARK PEDERSON

Number of Containers Type

2 DM-HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 10/31/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

320 BUILDING



# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 12/10/03 Time: 2:00 pm

Name of Inspector: MARK PETERSON

Number of Containers	Type
<u>8</u>	<u>DM - HAZ WASTE</u>
<u>1</u>	<u>DM - WASTE OIL</u>

- ☒ All containers in good condition
- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers

☒ All containers closed

- ☒ All containers properly marked and markings clearly visible
- Start date
  - Oldest start date: 11/6/03
  - Words "Hazardous Waste" on each container

- ☒ Emergency equipment present and in good condition
- Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

Signature: Mark Peterson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 12/10/03 Time: 2:00pm

Name of Inspector: MARK PETERSON

Number of Containers 3 Type DM

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 10/31/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson



320 BUILDING

# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 12/18/03 Time: 10:15 am

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>10</u>	<u>DM - HAZ WASTE</u>
<u>1</u>	<u>DM - WASTE OIL</u>

☒ All containers in good condition.

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson





535 BUILDING

# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 12/18/03 Time: 10:15am

Name of Inspector: Mark Peterson

Number of Containers 3 Type DM - HAZ WASTE

- ☒ All containers in good condition
- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers

☒ All containers closed

- ☒ All containers properly marked and markings clearly visible
- Start date
  - Oldest start date: 10/31/03
  - Words "Hazardous Waste" on each container

- ☒ Emergency equipment present and in good condition
- Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

Signature: Mark E Peterson



320 BLDG

## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 12/23/03 Time: 9:30 am

Name of Inspector: Mark Peterson

Number of Containers	Type
<u>1</u>	<u>DM-WASTE OIL</u>
<u>13</u>	<u>DM-HAZ WASTE</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson



335 BLDG

## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 12/23/03 Time: 9:30 am

Name of Inspector: MARIL PETERSON

Number of Containers 3 Type DM - HAZ WASTE

- ☒ All containers in good condition
- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Oldest start date: 10/31/03
- Words "Hazardous Waste" on each container

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Alarms
- Hoses
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

Signature: Maril E Peterson



320 BUILDING

## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 12/30/03 Time: 9:30 am

Name of Inspector: MARK PEDERSON

Number of Containers      Type

3      DM - HAZ WASTE

1      DM - WASTE OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark Pederson

335. BUILDING



# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 12/30/03 Time: 9:30 am

Name of Inspector: MARK PETERSON

Number of Containers	Type
<u>3</u>	<u>DM</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 10/31/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark Peterson

320 BUILDING



# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 1/9/04 Time: 9:00 AM

Name of Inspector: MARK PETERSON

Number of Containers      Type

16      DM-HAZ WASTE

2      DM-WASTE OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson

335. BUILDING



# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 1/9/04 Time: 9:00 AM

Name of Inspector: MARK PETERSON

Number of Containers Type

3 DM

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 10/31/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson





## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 1/14/04 Time: 8:40 AM

Name of Inspector: MARK PEDERSON

Number of Containers      Type

18      DM-HAZ WASTE

2      DM-USED OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/14/04 Time: 8:40 AM

Name of Inspector: MARK PEDERSON

Number of Containers 3 Type DM-HAZ WASTE

- ☒ All containers in good condition
- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Oldest start date: 10/31/03
- Words "Hazardous Waste" on each container

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Alarms
- Hoses
- Spill response materials

☒ Ignitable and reactive waste  $\geq 15$  m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

Signature: Mark E Pederson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/19/04 Time: 9:00am

Name of Inspector: MARK PETERSON

Number of Containers Type

18 DM-HAZ WASTE

2 DM-WASTE OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒

None

Signature: Mark E Peterson



335 BUILDING

# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/19/04 Time: 9:00 am

Name of Inspector: Mark Peterson

Number of Containers 3 Type DM-HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 10/31/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Peterson



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 1/29/04 Time: 7:15 AM

Name of Inspector: MARK PEDERSON

Number of Containers      Type

23      DM - HAZ WASTE

2      DM - WASTE OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 11/6/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

3315 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 11/29/04 Time: 7:15 AM

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>4</u>	<u>DM</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 10/31/03

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

320 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 2/5/04 Time: 10:20 AM

Name of Inspector: MARK E. PETERSON

Number of Containers Type

1 DM-HAZ WASTE

2 DM - WASTE OIL

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 2/2/04

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E. Peterson





235 BUILDING

# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 2/5/04 Time: 10:20 AM

Name of Inspector: MARK PEDERSON

Number of Containers	Type
_____	_____
_____	_____
_____	_____

- ☒ All containers in good condition
  - No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
  - No evidence of leaks
  - Containers not dented, crushed or punctured
  - General condition of containers
- ☒ All containers closed
- ☒ All containers properly marked and markings clearly visible
  - Start date
  - Words "Hazardous Waste" on each container
  - Oldest start date: \_\_\_\_\_
- ☒ Emergency equipment present and in good condition
  - Fire extinguishers
  - Alarms
  - Hoses
  - Spill response materials
- ☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line
- ☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature: Mark E Pederson



330 BUILDING

# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 2/11/04 Time: 2:50 pm

Name of Inspector: MARK PEDERSON

Number of Containers	Type
<u>4</u>	<u>DM-HAZ WASTE</u>
<u>2</u>	<u>DM-WASTE OIL</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)
- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Oldest start date: 2/2/04
- Words "Hazardous Waste" on each container

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Alarms
- Hoses
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken: ☒ None

Signature: Mark E Pederson



335 BUILDING

# WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: FEB 11, 2004 Time: 2:50pm

Name of Inspector: MARK PETERSON

Number of Containers	Type
<u>1</u>	<u>DM</u>

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 2/10/04

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark Peterson

WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 2/18/04 Time: 8:10 am

Name of Inspector: MARK PEDERSON

Number of Containers Type

2 DM - WASTE OIL

5 DM - HAZ WASTE

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

• No evidence of leaks

• Containers not dented, crushed or punctured

• General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 2/2/04

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

• Alarms

• Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Pederson

335 BUILDING



## WEEKLY CONTAINER STORAGE INSPECTION LOG

Date: 2/18/04 Time: 8:10 am

Name of Inspector: Mark Foxerson

Number of Containers Type

2 DM

\_\_\_\_\_

\_\_\_\_\_

☒ All containers in good condition

- No evidence of corrosion (e.g., pitting or severe rust/deterioration other than minor surface discoloring)

- No evidence of leaks
- Containers not dented, crushed or punctured
- General condition of containers

☒ All containers closed

☒ All containers properly marked and markings clearly visible

- Start date
- Words "Hazardous Waste" on each container

• Oldest start date: 2/10/04

☒ Emergency equipment present and in good condition

- Fire extinguishers
- Hoses

- Alarms
- Spill response materials

☒ Ignitable and reactive waste  $\geq$  15 m. or 50 feet from property line

☒ No incompatible wastes together.

Description of any problems found and actions taken:

☒ None

Signature: Mark E Foxerson

ATTACHMENT 2

REQUEST # 3





ATTACHMENT 3

REQUEST #4

ATTACHMENT 4

REQUEST # 5

# *Certificate*

This is to certify that

Joseph A. Miceli  
Rollprint Packaging Products, Incorporated

has successfully completed

**RCRA and DOT  
Annual Update and Refresher**

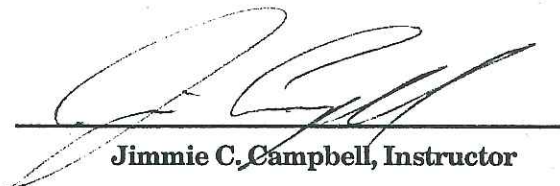
in accordance with 40 CFR 265.16 and 49 CFR 172.704

presented by

**ENVIRONMENTAL RESOURCE CENTER**

101 Center Pointe Drive, Cary, NC 27513 919-469-1585

[www.ercweb.com](http://www.ercweb.com)



Jimmie C. Campbell, Instructor

July 1, 2002

Date

Certificate Number: 80646

ATTACHMENT 5

REQUEST # 6

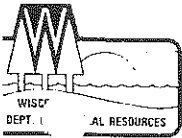




ATTACHMENT 6

REQUEST # 7





STATE OF WISCONSIN  
Chapter 291, Wis. Stats.  
Form 4400-66P

Rev. 1-99

ALL COPIES MUST BE LEGIBLE,  
PLEASE TYPE

State of Wisconsin  
Department of Natural Resources  
Bureau of Waste Management  
Box 8094  
Madison, WI 53708

FOR DNR USE ONLY

Printed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. ILD 984766842		Manifest Document No. 30049		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address ROLL-PRINT PACKAGING 320 STEWART AVE ADDISON IL 60101				Site Location If Different IL 60101		A. State Manifest Document Number WI K231840							
4. Generator's Phone (630) 628-1700						B. State Generator's ID							
5. Transporter 1 Company Name SET ENVIRONMENTAL				6. US EPA ID Number ILD 981997236		C. State Transporter's ID 11957							
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone 800-742-9020							
9. Designated Facility Name and Site Address BRENNTAG GREAT LAKES LLC N59 W14776 BOBOLINK AVE. MENOMONEE FALLS, WI 53051				10. US EPA ID Number WID 023350172		E. State Transporter's ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone (262)-252-3550							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		I. Waste No.	
a. RG WASTE FLAMMABLE LIQUIDS, N.E.S. (2172 ACETATE, METHYL ETHYL KETONE) 3 UN1993 PG II						230 M		211650		9		F, O, O, S	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information AVERAGE 128 EMER RESP PH # (630) 628-1700													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;  OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name & Position Title MARK PEDERSON EHS MANAGER						Signature <i>Mark Pederson</i>				Date Month Day Year 02 28 2002			
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name & Position Title DAVE SWEENEY						Signature <i>Dave Sweeney</i>				Date Month Day Year 02 28 2002			
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name & Position Title						Signature				Date Month Day Year			
19. Discrepancy Indication Space													
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
1. Typed Name & Position Title						Signature				Date Month Day Year			

A. Generator Name ROLLAPINT PACKAGING US EPA ID# 320 984766642  
Address 320 STE WART AVE Manifest # UIK 231840  
ADDISON IL 60101 Profile# (s) 011002B

B. ☒ (Check if applicable)

Restricted Waste contained in this shipment and referenced by the above Manifest number that are listed below are subject to the treatment standards set forth in 40 CFR 268.40. For each waste code, list the corresponding Subcategory, if applicable. Record an "X" in the appropriate column below for Treatability Group and each disclosure form attached.

[illegible]

C.

Profile Number	USEPA Hazardous Waste Code	Constituent	Concentration
		<input type="checkbox"/> Liquid wastes containing Nickel	134 mg/L
		<input type="checkbox"/> Liquid wastes containing Thallium	130 mg/L
		<input type="checkbox"/> Wastes containing HOC's*	1000 mg/kg
		(*) HOC's as defined in 40 CFR 268 Appendix III	

D. Notification Statement: This waste must be treated to the applicable treatment standards set forth in 40 CFR 268 Subpart D, Section 268.32, or RCRA Section 3004 (d). Waste analysis is attached where available, otherwise the information herein is based upon my thorough knowledge of the waste(s). I hereby certify that the information provided is complete and accurate based on my knowledge of the material.

\*

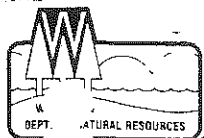
## Generator Signature

Date \_\_\_\_\_

\*

**Title**

# Generator Copy



## STATE OF WISCONSIN

Chapter 291, Wis. Stats.

Form 4400-66P

Rev. 1-99

ALL COPIES MUST BE LEGIBLE,  
PLEASE TYPE

State of Wisconsin  
Department of Natural Resources  
Bureau of Waste Management  
Box 8094  
Madison, WI 53708

FOR DNR USE ONLY

Fo. gned for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD 494755542	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address ROLLPRINT PACKAGING 320 STEWART AVE ADDISON IL 60101		Site Location If Different		A. State Manifest Document Number WI K231840	
4. Generator's Phone ( ) 630 629-1700				B. State Generator's ID	
5. Transporter 1 Company Name SET ENVIRONMENTAL		6. US EPA ID Number ILD 781957236		C. State Transporter's ID 11053	
7. Transporter 2 Company Name BGL Service		8. US EPA ID Number 1110 0233 50192		D. Transporter's Phone	
9. Designated Facility Name and Site Address BRENNTAG GREAT LAKES LLC N59 W14776 BOBOLINK AVE. MENOMONEE FALLS, WI 53051		10. US EPA ID Number WIS 023350192		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone (262)-252-3550	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. RC WASTE FLAMMABLE LIQUIDS; N.O.S. (METHYL METHYL ETHYL KETONE) 3 UN1993 PG II		230	A	116.50	9
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information AYERG# 128 EMER RESP PH #: (630) 626-1700					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;  OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name & Position Title MARK ROBERTSON EHS MANAGER		Signature [Signature]		Date 02/21/99	
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials		Signature [Signature]		Date 02/21/99	
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials		Signature [Signature]		Date 03/10/99	
19. Discrepancy Indication Space					
FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name & Position Title Ivo Metz		Signature [Signature]		Date 02/11/99	

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:

1 - Generator send to Wis. DNR

2 - Generator retain

3 - Facility send to Wis. DNR

4 - Facility retain

5 - Facility send to Generator

6 - Transporter retain

Emergency 24 Hour Assistance  
and Spill Reporting

COPY 5 -

Copies 1 &amp; 3 mail to Wis. DNR at above address.

Telephone Number: (800) 943-0003 FACILITY SEND TO GENERATOR

**FACSIMILE TRANSMISSION**

320 Stewart Avenue • Addison, Illinois • 60101-3375 • Phone (630) 628-1700 • Fax: (630) 628-3505

To:	Jamie Paulin
Company:	U.S. EPA Region 5
Fax #:	(312) 353-4342
From:	Mark Pederson
Date:	April 29, 2004
Number of Pages:	2

**MESSAGE:****JAMIE, ENCLOSED IS CORRECTED LDR FORM AS REQUESTED.****MARK PEDERSON, EHS MANAGER  
ROLLPRINT PACKAGING PRODUCTS**

The information contained in this facsimile transmission is intended for the use of the addressee and may contain information that is confidential, privileged or otherwise exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or reproduction of this transmission is strictly prohibited. If you have received this transmission in error, please notify the sender by telephone and return the original message to the above via the U.S. Postal Service. Thank you.

**Problems Receiving This Fax: Call (630) 628-1700**

# Generator Copy



**BRENNTAG GREAT LAKES, LLC**  
**LAND DISPOSAL RESTRICTION (LDR) AND NOTIFICATION FORM**

A Generator Name ROLLPRINT PACKAGING US EPA ID# ILD 984766642  
 Address 320 STEWART AVE Manifest # WIK 231840  
ADDISON, IL 60101 Profile# (s) 011002B

B. ☒ (Check if applicable)

Restricted Waste contained in this shipment and referenced by the above Manifest number that are listed below are subject to the treatment standards set forth in 40 CFR 268.40. For each waste code, list the corresponding Subcategory, if applicable. Record an "X" in the appropriate column below for Treatability Group and each disclosure form attached.

(1) Profile Number	(2) USEPA Hazardous Waste Codes	(3) Subcategory (if applicable)	(4) Treatability Group		(5) F001-F005 Disclosure Form	(6) UTS Disclosure Form	
			NWW	WW	Attached	Attached	
011002B	F005						
	F003						
	D001						
	D035						

Profile Number	USEPA Hazardous Waste Code	Constituent	Concentration
		<input type="checkbox"/> Liquid wastes containing Nickel	134 mg/L
		<input type="checkbox"/> Liquid wastes containing Thallium	130 mg/L
		<input type="checkbox"/> Wastes containing HOC's*	1000 mg/kg
(*) HOC's as defined in 40 CFR 268 Appendix III			

D. Notification Statement: This waste must be treated to the applicable treatment standards set forth in 40 CFR 268 Subpart D, Section 268.32, or RCRA Section 3004 (d). Waste analysis is attached where available, otherwise the information herein is based upon my thorough knowledge of the waste(s). I hereby certify that the information provided is complete and accurate based on my knowledge of the material.

\* Mark E. Robinson  
 Generator Signature

2.28.07  
 Date

\* EHS MANAGER  
 Title

**Generator Copy**

# E. Treatment Standards for F001 - F005 Spent Solvents Disclosure Form

Underlying constituents for F001 - F005. The waste material reference in page 1 section B meets the treatment standards for the hazardous constituents marked below.

Profile Number:

Hazardous Waste No.	Constituents of concern	Nonwastewater		Wastewater Total composition mg/L
		Total composition mg/kg	TCLP mg/L	
F001-	<input type="checkbox"/> Carbon tetrachloride	5.6	-	0.06
	<input type="checkbox"/> Methylene chloride	33	-	0.09
	<input type="checkbox"/> Tetrachloroethylene	5.6	-	0.06
	<input type="checkbox"/> 1,1,1-Trichloroethane	5.6	-	0.05
	<input type="checkbox"/> Trichloroethylene	5.6	-	0.05
	<input type="checkbox"/> 1,1,2-Trichloro-1,2,2-trifluoroethane	28	-	0.06
	<input type="checkbox"/> Trichloromonofluoromethane	33	-	0.02
F002-	<input type="checkbox"/> Chlorobenzene	5.7	-	0.06
	<input type="checkbox"/> o-Dichlorobenzene	6.2	-	0.09
	<input type="checkbox"/> Methylene chloride	33	-	0.09
	<input type="checkbox"/> Methylene chloride (Pharmaceutical Industry-Wastewater Subcategory)	-	-	0.44
	<input type="checkbox"/> Tetrachloroethylene	5.6	-	0.06
	<input type="checkbox"/> 1,1,1-Trichloroethane	5.6	-	0.05
	<input type="checkbox"/> 1,1,2-Trichloroethane	7.6	-	0.03
F003-	<input type="checkbox"/> Trichloroethylene	5.6	-	0.05
	<input type="checkbox"/> 1,1,2-Trichloro-1,2,2-trifluoroethane	28	-	0.06
	<input type="checkbox"/> Trichloromonofluoromethane	33	-	0.02
	<input type="checkbox"/> Acetone	160	-	0.28
	<input type="checkbox"/> n-Butyl alcohol	2.6	-	5.6
	<input type="checkbox"/> Cyclohexanone*		0.75	0.36*
	<input checked="" type="checkbox"/> Ethyl acetate	33	-	0.34
F004-	<input type="checkbox"/> Ethyl benzene	6	-	0.06
	<input type="checkbox"/> Ethyl ether	160	-	0.12
	<input type="checkbox"/> Methanol*		0.75	5.6*
	<input type="checkbox"/> Methyl isobutyl ketone	33	-	0.14
	<input type="checkbox"/> Xylenes (total)	28	-	0.32
	<input type="checkbox"/> Cresol (m-and p- isomers)	3.2	-	0.77
	<input type="checkbox"/> o-Cresol	5.6	-	0.11
F005-	<input type="checkbox"/> Nitrobenzene	14	-	0.07
	<input type="checkbox"/> Benzene	3.7	-	0.07
	<input type="checkbox"/> Carbon disulfide*		4.8	.014*
	<input type="checkbox"/> 2-Ethoxyethanol	INCIN	-	BIODG; or INCIN
	<input type="checkbox"/> Isobutyl alcohol	170	-	5.6
	<input checked="" type="checkbox"/> Methyl ethyl ketone	36	-	0.28
	<input type="checkbox"/> 2-Nitropropane	INCIN	-	(WETOX or CHOXD)
EH	<input type="checkbox"/> Pyridine	16	-	0.01
	<input checked="" type="checkbox"/> Toluene	28	-	0.08

Note: F005 spent solvent wastes containing 2-Nitropropane and/or 2-Ethoxyethanol have treatment standards outlined in 40 CFR 268.40 and must be referenced in Table B page 2. (\*) The treatment standards for Carbon Disulfide, Cyclohexanone, and Methanol nonwastewaters are based on the TCLP and apply only to spent solvents containing one, two, or all three of these constituents. If a waste contains any of these three constituents along with any other constituents found in F001-F005, then only the treatment standards for the other constituents apply (i.e., the standard for Carbon Disulfide, Cyclohexanone, and Methanol do not apply when other constituents are present).



# F. Universal Treatment Standards Disclosure Form

Underlying constituents for D001\*\* (low TOC, non-CWA), D002 (non-CWA), D012-D017 (nonwastewater), D018-D043

(non-CWA), and F039. The waste material in Section B exceeds the treatment standards for the hazardous constituents marked below.

☐ Check if none of the underlying hazardous constituents apply

Constituents	NWW	WW	Constituents	NWW	WW	Constituents	NWW	WW
Acenaphthylene	3.4	0.059	Dichlorodifluoromethane	7.2	0.23	5-Nitro-o-toluidine	28	0.32
Acenaphthene	3.4	0.059	1,1-Dichloroethane	6	0.059	o-Nitrophenol	13	0.028
Acetone	160	0.28	1,2-Dichloroethane	6	0.21	p-Nitrophenol	29	0.12
Acetonitrile	1.8	5.6	1,1-Dichloroethylene	6	0.025	N-Nitrosodiethylamine	28	0.4
Acetophenone	9.7	0.01	trans-1,2-Dichloroethylene	30	0.054	N-Nitrosodimethylamine	2.3	0.4
2-Acetylaminofluorene	140	0.059	2,4-Dichlorophenol	14	0.044	N-Nitroso-di-n-butylamine	17	0.4
Acrolein	NA	0.29	2,6-Dichlorophenol	14	0.044	N-Nitrosomethylethylamine	2.3	0.4
Acrylamide	23	19	1,2-Dichloropropane	18	0.85	N-Nitrosomorpholine	2.3	0.4
Acrylonitrile	84	0.24	cis-1,3-Dichloropropylene	18	0.036	N-Nitrosopiperidine	35	0.013
Aldrin	0.066	0.021	trans-1,3-Dichloropropylene	18	0.036	N-Nitrosopyrrolidine	35	0.013
4-Aminobiphenyl	NA	0.13	Dieldrin	0.13	0.017	Parathion	4.6	0.014
Aniline	14	0.81	Diethyl phthalate	28	0.2	Total PCB's (all Aroclors)	10	0.1
Anthracene	3.4	0.059	2,4-Dimethyl phenol	14	0.036	Pentachlorobenzene	10	0.055
Aramite	NA	0.36	Dimethyl phthalate	28	0.047	PeCDDs (All PeCDDs)	0.001	0.000063
alpha-BHC	0.066	0.0001	Di-n-butyl phthalate	28	0.057	PeCDFs (All PeCDFs)	0.001	0.000035
beta-BHC	0.066	0.0001	1,4-Dinitrobenzene	2.3	0.32	Pentachloroethane	6	0.055
delta-BHC	0.066	0.023	4,6-Dinitro-o-cresol	160	0.28	Pentachloronitrobenzene	4.8	0.055
gamma-BHC	0.066	0.0017	2,4-Dinitrophenol	160	0.12	Pentachlorophenol	7.4	0.089
Benzene	10	0.14	2,4-Dinitrotoluene	140	0.32	Phenacetin	16	0.081
Benz(a)anthracene	3.4	0.059	2,6-Dinitrotoluene	28	0.55	Phenanthrene	5.6	0.059
Benzal chloride	6	0.055	Di-n-octyl phthalate	28	0.017	Phenol	6.2	0.039
Benzo(b)fluoranthene	6.8	0.11	p-Dimethylaminoazobenzene	NA	0.13	Phorate	4.6	0.021
Benzo(k)fluoranthene	6.8	0.11	Di-n-propylnitrosamine	14	0.4	Phthalic acid	28	0.055
Benzo(g,h,i)perylene	1.8	0.0055	1,4-Dioxane	170	NA	Phthalic anhydride	28	0.055
Benzo(a)pyrene	3.4	0.061	Diphenylamine	13	0.92	Pronamide	1.5	0.093
Bromodichloromethane	15	0.35	Diphenylnitrosamine	13	0.92	Pyrene	8.2	0.067
Methyl bromide	15	0.11	1,2-Diphenylhydrazine	NA	0.087	Pyridine	1.6	0.014
(Bromomethane)			Disulfoton	6.2	0.017	Safrole	22	0.081
4-Bromophenyl phenyl etl	15	0.055	Endosulfan I	0.066	0.023	Silvex (2,4,5-TP)	7.9	0.72
n-Butyl alcohol	2.6	5.6	Endosulfan II	0.13	0.029	2,4,5-T (2,4,5-Trichloro-phenoxycetic acid)	7.9	0.72
Butyl benzyl phthalate	28	0.017	Endosulfan sulfate	0.13	0.029	1,2,4,5-Tetrachlorobenzene	14	0.055
2-sec-Butyl-4,6-dinitrophe	2.5	0.066	Endrin	0.13	0.0028	TCDDs (All TCDDs)	0.001	0.000063
(Dinoseb)			Endrin aldehyde	0.13	0.025	TCDFs (All TCDFs)	0.001	0.000063
Carbon disulfide	0mg/ITCLP	3.8	Ethyl acetate	33	0.34	1,1,1,2-Tetrachloroethane	6	0.057
Carbon tetrachloride	6	0.057	Ethyl cyanide (Propanenitrile)	360	0.24	1,1,2,2-Tetrachloroethane	6	0.057
Chlordane (alpha and gar isomers)	0.26	0.0033	Ethyl benzene	10	0.057	1,1,2,2-Tetrachloroethane	6	0.057
p-Chloroaniline	16	0.46	Ethyl ether	160	0.12	Tetrachloroethylene	6	0.056
Chlorobenzene	6	0.057	bis(2-Ethylhexyl) phthalate	28	0.28	2,3,4,6-Tetrachlorophenol	7.4	0.03
Chlorobenzilate	NA	0.1	Ethyl methacrylate	160	0.14	Toluene	10	0.08
2-Chloro-1,3-butadiene	0.28	0.057	Ethylene oxide	NA	0.12	Toxaphene	2.6	0.0095
Chlorodibromomethane	15	0.057	Famphur	15	0.017	Bromoform (Tribromomethane)	15	0.63
Chloroethane	6	0.27	Fluranthene	3.4	0.068	1,2,4-Trichlorobenzene	19	0.055
bis(2-Chloroethoxy)metha	7.2	0.036	Fluorene	3.4	0.059	1,1,1-Trichloroethane	6	0.054
bis(2-Chloroethyl)ether	6	0.033	Heptachlor	0.066	0.0012	1,1,2-Trichloroethane	6	0.054
Chloroform	6	0.046	Heptachlor epoxide	0.066	0.016	Trichloroethylene	6	0.054
bis(2-Chloroisopropyl)eth	7.2	0.055	Hexachlorobenzene	10	0.055	Trichloromonofluoromethane	30	0.02
p-Chloro-m-cresol	14	0.018	Hexachlorobutadiene	5.6	0.055	2,4,5-Trichlorophenol	7.4	0.18
2-Chloroethyl vinyl ether	NA	0.062	Hexachlorocyclopentadiene	2.4	0.057	2,4,6-Trichlorophenol	7.4	0.035
Chloromethane	30	0.19	HxCDDs (All HxCDDs)	0.001	6.3E-05	1,2,3-Trichloropropane	30	0.05
(Methyl chloride)			HxCDFs (All HxCDFs)	0.001	6.3E-05	1,1,2-Trichloro-1,2,2-trifluoro-ethane)	30	0.057
2-Chloronaphthalene	5.6	0.055	Hexachloroethane	30	0.055	tris-(2,3-Dibromoprophyl-phosphate)	0.1	0.11
2-Chlorophenol	5.7	0.044	Hexachloropropylene	30	0.035	Vinyl chloride	6	0.27
3-Chloropropylene	30	0.036	Indeno (1,2,3,-c,d) pyrene	3.4	0.0055	Xylenes-All mixed isomers	30	0.32
Chrysene	3.4	0.059	Iodomethane	65	0.19	Antimony	2.1mg/ITCLP	1.9
0-Cresol	5.6	0.11	Isobutyl alcohol	170	5.6	Arsenic	5.0mg/ITCLP	1.4
m-Cresol	5.6	0.77	Isodrin	0.066	0.21	Barium	7.6mg/ITCLP	1.2
p-Cresol	5.6	0.77	Isosafrole	2.6	0.081	Beryllium	0.014mg/ITCLP	0.82
Cyclohexanone	5mg/ITCLP	0.36	Kepone	0.13	0.0011	Cadmium	0.19mg/ITCLP	0.69
1,2-Dibromo-3-chloroprop	15	0.11	Methacrylonitrile	84	0.24	Chromium (Total)	0.86mg/ITCLP	2.77
Ethylene dibromide	15	0.028	Methanol	75mg/ITCLP	5.6	Cyanides (Total)*	590	1.2
(1,2-Dibromoethane)			Methapyriline	1.5	0.081	Cyanides (Amenable)*	30	0.86
Dibromomethane	15	0.11	Methoxychlor	0.18	0.25	Fluoride	NA	35
2,4-D (2,4-Dichloropheno acetic acid)	10	0.72	3-Methylcholanthrene	15	0.0055	Lead	0.37mg/ITCLP	0.69
o,p'-DDD	0.087	0.023	4,4-Methylene bis (2-chloro aniline)	38	0.5	Mercury-Nonwastewater from Retort	0.20mg/ITCLP	NA
p,p'-DDD	0.087	0.023	Methylene chloride	38	0.089	Mercury-All others	0.025mg/ITCLP	0.15
o,p'-DDE	0.087	0.031	Methyl ethyl ketone	36	0.28	Nickel	5.0mg/ITCLP	3.98
p,p'-DDE	0.087	0.031	Methyl isobutyl ketone	33	0.14	Selenium	0.16mg/ITCLP	0.82
o,p'-DDT	0.087	0.0039	Methyl methacrylate	160	0.018	Silver	0.30mg/ITCLP	0.43
p,p'-DDT	0.087	0.0039	Methyl methanesulfonate	NA	0.014	Sulfide	NA	14
Dibenz(a,h)anthracene	8.2	0.055	Methyl parathion	4.6	0.059	Thallium	0.70mg/ITCLP	1.4
Dibenz(a,e)pyrene	NA	0.061	Naphthalene	5.6	0.52	Vanadium	0.23mg/ITCLP	4.3
m-Dichlorobenzene	6	0.36	2-Naphthylamine	NA	0.27	Zinc	5.3mg/ITCLP	2.61
o-Dichlorobenzene	6	0.088	o-Nitroaniline	14	0.028			
p-Dichlorobenzene	6	0.09	p-Nitroaniline	28	0.028			
			Nitrobenzene	14	0.068			

\* Cyanides (Total) and Cyanides (Amenable) for nonwastewaters are to be analyzed using SW-846 Method or 9010 or 9012 with a sample size of 10 grams and a distillation time of one hour and 15 minutes.  
selection of D001 constituents is only required for low TOC ignitable liquids managed in nonCWA facilities.

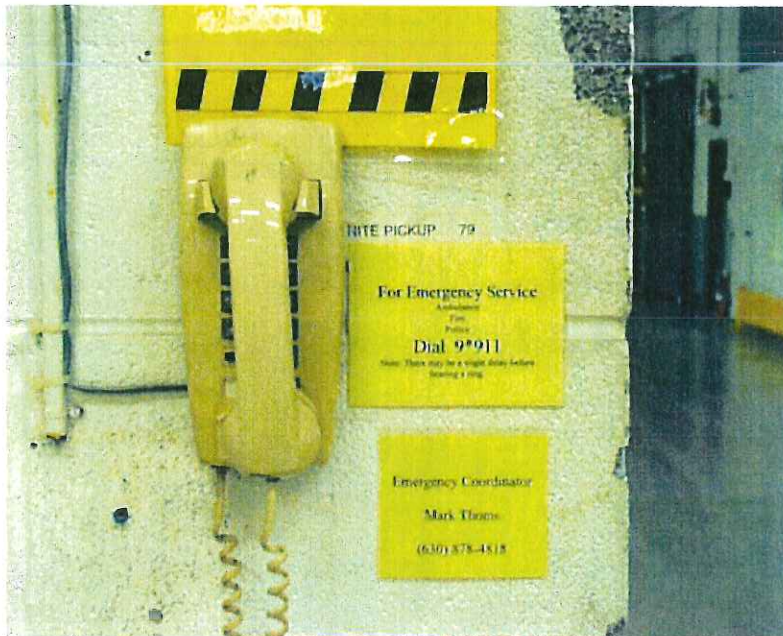
ATTACHMENT 7

REQUEST # 8









ATTACHMENT 8

REQUEST # 9

I certify under penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Dhuanne Dodrill

Name

DHUANNE DODRILL

Official Title

EXECUTIVE V. P.

Telephone No.

630-628-1700 x3208

Date Signed

3/5/04



Purpose: To insure hazardous wastes are removed in a timely and safe manner.

Application: All solvents and water based wastes.

Training Requirements: V.P. of Manufacturing, Manufacturing Manager, Environmental Health and Safety Manager, Printing Press Operator, Laminator Operator, Printing Press Helper, Laminator Helper, Color Matcher, Ink Room Assistant, Shift Supervisor, Operations Manager, Mounter/Plate Maker (Bloomfield)

Procedure:

**ADDISON**

1. The Equipment operators are responsible for separating hazardous wastes into the following categories:
  - Solvent Wastes.
  - Water-Based Inks.
  - Water-Based Latex Coatings.
2. Solvents wastes will be accumulated in steel drums located in the flammable liquids storage cabinets behind the equipment.
3. Water-based inks are accumulated in steel drums located in the ink room.
4. Water-based latex coatings are accumulated in fiber drums located near the Roto.
5. Operators will bring the sealed steel drums to the Ink Room when they are full.
6. Ink Room personnel will label and store the steel drums for disposal in the designated less than 90-day Hazardous Waste storage area.
7. The water-based latex coatings will be sent to the dock area for disposal by Ink Room personnel.
8. When the appropriate number of drums has accumulated, the Environmental, Health & Safety Manager will be notified. If the EHS Manager is unavailable, notify the V.P. of Manufacturing.
9. A hazardous waste pick-up will be scheduled with a qualified vendor.

**BLOOMFIELD**

1. The equipment operators are responsible for transferring hazardous waste generated at the machine to the 330-gallon totes located in the less-than-90 day storage area
2. The waste will be stored in the four (4) 330-gallon totes prior to off-site transfer.
3. Operators will transfer the wastes generated at the machine in 5-gallon pails to the Hazardous Waste storage area and place the waste in the appropriate tote.
4. The totes are to be marked with the words "Hazardous Waste." The date at which the tote first receives hazardous waste, that date will be place on the tote, identifying the start of the accumulation period.
5. When the last tote becomes half full, or the 90-day storage limit is approaching, the Manufacturing Manager will be notified.
6. A hazardous waste pick-up will be scheduled with a qualified vendor.

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**  
**BUREAU OF LAND/FIELD OPERATIONS SECTION**  
**RCRA INSPECTION REPORT**

**GENERAL FACILITY INFORMATION**

USEPA ID #: <i>FLD 984 766 642</i>		IEPA ID #:
Facility Name: <i>ROLLPRINT PARKING</i>		Phone #: <i>(630) 628-1700</i>
Location: <i>320 STEWART AVENUE, ADDISON, IL</i>		County: <i>DUPAGE</i>
City: <i>ADDISON</i>	State: <i>IL</i>	Zip Code: <i>60101</i>
Region: <i>D03 PLAINS</i>	Inspection Date: <i>10/30/02</i>	Time: <i>9:30 A</i>
Weather: <i>SUNNY, ~40'S</i>		

**TYPE OF FACILITY**

Notified As: <i>LCL</i>	Regulated As:
-------------------------	---------------

**TYPE OF INSPECTION**

<input checked="" type="checkbox"/> CEI:	<input type="checkbox"/> CME/O&M:	<input type="checkbox"/> CSI:	<input type="checkbox"/> NRR:	<input type="checkbox"/> CCI:	<input type="checkbox"/> PIF:	<input type="checkbox"/> CVI:	<input type="checkbox"/> CSE:	<input type="checkbox"/> CAO:
F/U to:		Other:						

**NOTIFICATION INFORMATION (EPA 8700-12)**

Notification Date:	(initial)	(subsequent)
--------------------	-----------	--------------

**PART A PERMIT INFORMATION (EPA 3510-3)**

Part A Date:	Amended:	Withdrawn:
--------------	----------	------------

**PART B PERMIT INFORMATION**

Part B Submitted:	Issued:	(check one)	Date:
-------------------	---------	-------------	-------

**ACTIVE ENFORCEMENT**

The company has been referred to USEPA:	IAGO:	County State's Attorney:
---	-------	--------------------------

**ACTIVE ENFORCEMENT ORDERS**

CACO:	CAFO:	Federal Court Order:
Consent Decree:	IPCB Order:	State Court Order:

[illegible]

## OPERATOR

Name:	Name:
Address:	Address:
City:	City:
State: Zip Code:	State: Zip Code:
Phone #:	Phone #:

**PHONE #**


PHONE #


PHONE #

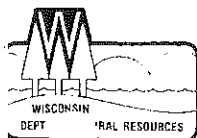
--	--	--

# WASTE DISPOSITION FORM

Facility Name:		USEPA ID #:
Inspection Date:		IEPA ID #:
Wastestream Name, Generating Process & HW #:		
Date of Last Analysis:	Amount On-site:	
Rate of Generation:	Last Manifested Shipment:	
On Notification (8700-12) Form:	Disposition:	
On Part A:		
On Annual Report:		
Wastestream Name, Generating Process & HW #:		
Date of Last Analysis:	Amount On-site:	
Rate of Generation:	Last Manifested Shipment:	
On Notification (8700-12) Form:	Disposition:	
On Part A:		
On Annual Report:		
Wastestream Name, Generating Process & HW #:		
Date of Last Analysis:	Amount On-site:	
Rate of Generation:	Last Manifested Shipment:	
On Notification (8700-12) Form:	Disposition:	
On Part A:		
On Annual Report:		
Wastestream Name, Generating Process & HW #:		
Date of Last Analysis:	Amount On-site:	
Rate of Generation:	Last Manifested Shipment:	
On Notification (8700-12) Form:	Disposition:	
On Part A:		
On Annual Report:		
Wastestream Name, Generating Process & HW #:		
Date of Last Analysis:	Amount On-site:	
Rate of Generation:	Last Manifested Shipment:	
On Notification (8700-12) Form:	Disposition:	
On Part A:		
On Annual Report:		

# WASTE DISPOSITION FORM

Facility Name:										USEPA ID #:		
Inspection Date:										IEPA ID #:		
Waste Name	Generating Process	Dt. of Last Anal.	USEPA HW #	On Notif. (8700-12)	On Part A Appl? (3510-3)	On Annual Report for Years:			Amt. On-Site	Rate of Genrtn.	Last Mnfst. Shpmnt.	Disposition of Waste



## STATE OF WISCONSIN

Chapter 291, Wis. Stats.  
Form 4400-66P

Rev. 1-99

ALL COPIES MUST BE LEGIBLE,  
PLEASE TYPEState of Wisconsin  
Department of Natural Resources  
Bureau of Waste Management  
Box 8094  
Madison, WI 53708

FOR DNR USE ONLY

Form Approved. OMB No. 2050-0039.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address		Site Location If Different		A. State Manifest Document Number <b>WI K231840</b>		
4. Generator's Phone ( )				B. State Generator's ID		
5. Transporter 1 Company Name		6. US EPA ID Number		C. State Transporter's ID <b>11002</b>		
7. Transporter 2 Company Name		8. US EPA ID Number <b>1410 0233 50192</b>		D. Transporter's Phone		
9. Designated Facility Name and Site Address		10. US EPA ID Number		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone <b>(262) 242-3800</b>		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. <b>HAZARDOUS WASTE</b>		<b>30</b>	<b>A</b>	<b>1/2</b>	<b>9</b>	<b>1000</b>
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;						
OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name & Position Title		Signature		Date		
<b>Mark L. ...</b>		<b>[Signature]</b>		<b>02/23/11</b>		
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name & Position Title		Signature		Date		
<b>[Signature]</b>		<b>[Signature]</b>		<b>02/23/11</b>		
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name & Position Title		Signature		Date		
<b>[Signature]</b>		<b>[Signature]</b>		<b>03/10/11</b>		
19. Discrepancy Indication Space						
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name & Position Title		Signature		Date		
<b>[Signature]</b>		<b>[Signature]</b>		<b>03/10/11</b>		

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:

- 1 - Generator send to Wis. DNR
- 2 - Generator retain
- 3 - Facility send to Wis. DNR

- 4 - Facility retain
- 5 - Facility send to Generator
- 6 - Transporter retain

Emergency 24 Hour Assistance  
and Spill Reporting

COPY 5 -

Copies 1 &amp; 3 mail to Wis. DNR at above address.

Telephone Number: (800) 943-0003 FACILITY SEND TO GENERATOR

# E. Treatment Standards for F001 - F005 Spent Solvents Disclosure Form

Underlying constituents for F001 - F005. The waste material reference in page 1 section B meets the treatment standards for the hazardous constituents marked below.

Profile Number: \_\_\_\_\_

Hazardous Waste No.	Constituents of concern	Nonwastewater		Wastewater Total composition mg/L
		Total composition mg/kg	TCLP mg/L	
F001-	<input type="checkbox"/> Carbon tetrachloride	5.6	-	0.06
	<input type="checkbox"/> Methylene chloride	33	-	0.09
	<input type="checkbox"/> Tetrachloroethylene	5.6	-	0.06
	<input type="checkbox"/> 1,1,1-Trichloroethane	5.6	-	0.05
	<input type="checkbox"/> Trichloroethylene	5.6	-	0.05
	<input type="checkbox"/> 1,1,2-Trichloro-1,2,2-trifluoroethane	28	-	0.06
	<input type="checkbox"/> Trichloromonofluoromethane	33	-	0.02
	<input type="checkbox"/> Chlorobenzene	5.7	-	0.06
F002-	<input type="checkbox"/> o-Dichlorobenzene	6.2	-	0.09
	<input type="checkbox"/> Methylene chloride	33	-	0.09
	<input type="checkbox"/> Methylene chloride (Pharmaceutical Industry-Wastewater Subcategory)	-	-	0.44
	<input type="checkbox"/> Tetrachloroethylene	5.6	-	0.06
	<input type="checkbox"/> 1,1,1-Trichloroethane	5.6	-	0.05
	<input type="checkbox"/> 1,1,2-Trichloroethane	7.6	-	0.03
	<input type="checkbox"/> Trichloroethylene	5.6	-	0.05
	<input type="checkbox"/> 1,1,2-Trichloro-1,2,2-trifluoroethane	28	-	0.06
F003-	<input type="checkbox"/> Trichloromonofluoromethane	33	-	0.02
	<input type="checkbox"/> Acetone	160	-	0.28
	<input type="checkbox"/> n-Butyl alcohol	2.6	-	5.6
	<input type="checkbox"/> Cyclohexanone*		0.75	0.36*
	<input checked="" type="checkbox"/> Ethyl acetate	33	-	0.34
	<input type="checkbox"/> Ethyl benzene	6	-	0.06
	<input type="checkbox"/> Ethyl ether	160	-	0.12
	<input type="checkbox"/> Methanol*		0.75	5.6*
F004-	<input type="checkbox"/> Methyl isobutyl ketone	33	-	0.14
	<input type="checkbox"/> Xylenes (total)	28	-	0.32
	<input type="checkbox"/> Cresol (m-and p- isomers)	3.2	-	0.77
	<input type="checkbox"/> o-Cresol	5.6	-	0.11
F005-	<input type="checkbox"/> Nitrobenzene	14	-	0.07
	<input type="checkbox"/> Benzene	3.7	-	0.07
	<input type="checkbox"/> Carbon disulfide*		4.8	.014*
	<input type="checkbox"/> 2-Ethoxyethanol	INCIN	-	BIODG; or INCIN
	<input type="checkbox"/> Isobutyl alcohol	170	-	5.6
	<input checked="" type="checkbox"/> Methyl ethyl ketone	36	-	0.28
	<input type="checkbox"/> 2-Nitropropane	INCIN	-	(WETOX or CHOXD)
	<input type="checkbox"/> Pyridine	16	-	0.01
	<input checked="" type="checkbox"/> Toluene	28	-	0.08

Note: F005 spent solvent wastes containing 2-Nitropropane and/or 2-Ethoxyethanol have treatment standards outlined in 40 CFR 268.40 and must be referenced in Table B page 2. (\*) The treatment standards for Carbon Disulfide, Cyclohexanone, and Methanol nonwastewaters are based on the TCLP and apply only to spent solvents containing one, two, or all three of these constituents. If a waste contains any of these three constituents along with any other constituents found in F001-F005, then only the treatment standards for the other constituents apply (i.e., the standard for Carbon Disulfide, Cyclohexanone, and Methanol do not apply when other constituents are present).



# Universal Treatment Standards Disclosure Form

Underlying constituents for D001\*\* (low TOC, non-CWA), D002 (non-CWA), D012-D017 (nonwastewater), D018-D043

(non-CWA), and F039. The waste material in Section B exceeds the treatment standards for the hazardous constituents marked below.

☐ Check if none of the underlying hazardous constituents apply

Constituents	NWW	WW	Constituents	NWW	WW	Constituents	NWW	WW
acenaphthylene	3.4	0.059	Dichlorodifluoromethane	7.2	0.23	5-Nitro-o-toluidine	28	0.32
acenaphthene	3.4	0.059	1,1-Dichloroethane	6	0.059	o-Nitrophenol	13	0.028
Acetone	160	0.28	1,2-Dichloroethane	6	0.21	p-Nitrophenol	29	0.12
acetonitrile	1.8	5.6	1,1-Dichloroethylene	6	0.025	N-Nitrosodiethylamine	28	0.4
acetophenone	9.7	0.01	trans-1,2-Dichloroethylene	30	0.054	N-Nitrosodimethylamine	2.3	0.4
2-Acetylaminofluorene	140	0.059	2,4-Dichlorophenol	14	0.044	N-Nitroso-di-n-butylamine	17	0.4
Acrolein	NA	0.29	2,6-Dichlorophenol	14	0.044	N-Nitrosomethylethylamine	2.3	0.4
Acrylamide	23	19	1,2-Dichloropropane	18	0.85	N-Nitrosomorpholine	2.3	0.4
Acrylonitrile	84	0.24	cis-1,3-Dichloropropylene	18	0.036	N-Nitrosopiperidine	35	0.013
Aldrin	0.066	0.021	trans-1,3-Dichloropropylene	18	0.036	N-Nitrosopyrrolidine	35	0.013
4-Aminobiphenyl	NA	0.13	Dieldrin	0.13	0.017	Parathion	4.6	0.014
Aniline	14	0.81	Diethyl phthalate	28	0.2	Total PCB's (all Aroclors)	10	0.1
Anthracene	3.4	0.059	2,4-Dimethyl phenol	14	0.036	Pentachlorobenzene	10	0.055
Aramite	NA	0.36	Dimethyl phthalate	28	0.047	PeCDDs (All PeCDDs)	0.001	0.000063
alpha-BHC	0.066	0.0001	Di-n-butyl phthalate	28	0.057	PeCDFs (All PeCDFs)	0.001	0.000035
beta-BHC	0.066	0.0001	1,4-Dinitrobenzene	2.3	0.32	Pentachloroethane	6	0.055
delta-BHC	0.066	0.023	4,6-Dinitro-o-cresol	160	0.28	Pentachloronitrobenzene	4.8	0.055
gamma-BHC	0.066	0.0017	2,4-Dinitrophenol	160	0.12	Pentachlorophenol	7.4	0.089
Benzene	10	0.14	2,4-Dinitrotoluene	140	0.32	Phenacetin	16	0.081
Benz(a)anthracene	3.4	0.059	2,6-Dinitrotoluene	28	0.55	Phenanthrene	5.6	0.059
Benzal chloride	6	0.055	Di-n-octyl phthalate	28	0.017	Phenol	6.2	0.039
Benzo(b)fluoranthene	6.8	0.11	p-Dimethylaminoazobenzene	NA	0.13	Phorate	4.6	0.021
Benzo(k)fluoranthene	6.8	0.11	Di-n-propylnitrosamine	14	0.4	Phthalic acid	28	0.055
Benzo(g,h,i)perylene	1.8	0.0055	1,4-Dioxane	170	NA	Phthalic anhydride	28	0.055
Benzo(a)pyrene	3.4	0.061	Diphenylamine	13	0.92	Pronamide	1.5	0.093
Bromodichloromethane	15	0.35	Diphenylnitrosamine	13	0.92	Pyrene	8.2	0.067
Methyl bromide	15	0.11	1,2-Diphenylhydrazine	NA	0.087	Pyridine	1.6	0.014
(Bromomethane)			Disulfoton	6.2	0.017	Safrole	22	0.081
4-Bromophenyl phenyl etl	15	0.055	Endosulfan I	0.066	0.023	Silvex (2,4,5-TP)	7.9	0.72
n-Butyl alcohol	2.6	5.6	Endosulfan II	0.13	0.029	2,4,5-T (2,4,5-Trichloro- phenoxyacetic acid)	7.9	0.72
Butyl benzy phthalate	28	0.017	Endosulfan sulfate	0.13	0.029	1,2,4,5-Tetrachlorobenzene	14	0.055
2-sec-Butyl-4,6-dinitrophe	2.5	0.066	Endrin	0.13	0.0028	TCDDs (All TCDDs)	0.001	0.000063
(Dinoseb)			Endrin aldehyde	0.13	0.025	TCDFs (All TCDFs)	0.001	0.000063
Carbon disulfide	0mg/ITCLP	3.8	Ethyl acetate	33	0.34	1,1,1,2-Tetrachloroethane	6	0.057
Carbon tetrachloride	6	0.057	Ethyl cyanide (Propanenitrile)	360	0.24	1,1,2,2-Tetrachloroethane	6	0.057
Chlordane (alpha and gar isomers)	0.26	0.0033	Ethyl benzene	10	0.057	Tetrachloroethylene	6	0.056
p-Chloroaniline	16	0.46	Ethyl ether	160	0.12	2,3,4,6-Tetrachlorophenol	7.4	0.03
Chlorobenzene	6	0.057	bis(2-Ethylhexyl) phthalate	28	0.28	Toluene	10	0.08
Chlorobenzilate	NA	0.1	Ethyl methacrylate	160	0.14	Toxaphene	2.6	0.0095
2-Chloro-1,3-butadiene	0.28	0.057	Ethylene oxide	NA	0.12	Bromoform (Tribromomethane)	15	0.63
Chlorodibromomethane	15	0.057	Famphur	15	0.017	1,2,4-Trichlorobenzene	19	0.055
Chloroethane	6	0.27	Fluranthene	3.4	0.068	1,1,1-Trichloroethane	6	0.054
bis(2-Chloroethoxy)metha	7.2	0.036	Fluorene	3.4	0.059	1,1,2-Trichloroethane	6	0.054
bis(2-Chloroethyl)ether	6	0.033	Heptachlor	0.066	0.0012	Trichloroethylene	6	0.054
Chloroform	6	0.046	Heptachlor epoxide	0.066	0.016	Trichloromonofluoromethane	30	0.02
bis(2-Chloroisopropyl)eth	7.2	0.055	Hexachlorobenzene	10	0.055	2,4,5-Trichlorophenol	7.4	0.18
p-Chloro-m-cresol	14	0.018	Hexachlorobutadiene	5.6	0.055	2,4,6-Trichlorophenol	7.4	0.035
2-Chloroethyl vinyl ether	NA	0.062	Hexachlorocyclopentadiene	2.4	0.057	1,2,3-Trichloropropane	30	0.05
Chloromethane	30	0.19	HxCDDs (All HxCDDs)	0.001	6.3E-05	1,1,2-Trichloro-1,2,2-trifluoro- ethane)	30	0.057
(Methyl chloride)			HxCDFs (All HxCDFs)	0.001	6.3E-05	tris-(2,3-Dibromoprophyl- phosphate)	0.1	0.11
2-Chloronaphthalene	5.6	0.056	Hexachloroethane	30	0.055	Vinyl chloride	6	0.27
2-Chlorophenol	5.7	0.044	Hexachloropropylene	30	0.035	Xylenes-All mixed isomers	30	0.32
3-Chloropropylene	30	0.036	Indeno (1,2,3-c,d) pyrene	3.4	0.0055	Antimony	2.1mg/ITCLP	1.9
Chrysene	3.4	0.059	Iodomethane	65	0.19	Arsenic	5.0mg/ITCLP	1.4
0-Cresol	5.6	0.11	Isobutyl alcohol	170	5.6	Barium	7.6mg/ITCLP	1.2
m-Cresol	5.6	0.77	Isodrin	0.066	0.21	Beryllium	0.014mg/ITCLP	0.82
p-Cresol	5.6	0.77	Isosafrole	2.6	0.081	Cadmium	0.19mg/ITCLP	0.69
Cyclohexanone	5mg/ITCLP	0.36	Kepone	0.13	0.0011	Chromium (Total)	0.86mg/ITCLP	2.77
1,2-Dibromo-3-chloroprop	15	0.11	Methacrylonitrile	84	0.24	Cyanides (Total)*	590	1.2
Ethylene dibromide	15	0.028	Methanol	75mg/ITCLP	5.6	Cyanides (Amenable)*	30	0.86
(1,2-Dibromoethane)			Methapyriline	1.5	0.081	Fluoride	NA	35
Dibromomethane	15	0.11	Methoxychlor	0.18	0.25	Lead	0.37mg/ITCLP	0.69
2,4-D (2,4-Dichloropheno acetic acid)	10	0.72	3-Methylcholanthrene	15	0.0055	Mercury-Nonwastewater from Retort	0.20mg/ITCLP	NA
o,p'-DDD	0.087	0.023	4,4-Methylene bis (2-chloro aniline)	38	0.5	Mercury-All others	0.025mg/ITCLP	0.15
p,p'-DDD	0.087	0.023	Methylene chloride	38	0.089	Nickel	5.0mg/ITCLP	3.98
o,p'-DDE	0.087	0.031	Methyl ethyl ketone	36	0.28	Selenium	0.16mg/ITCLP	0.82
p,p'-DDE	0.087	0.031	Methyl isobutyl ketone	33	0.14	Silver	0.30mg/ITCLP	0.43
o,p'-DDT	0.087	0.0039	Methyl methacrylate	160	0.14	Sulfide	NA	14
p,p'-DDT	0.087	0.0039	Methyl methanesulfonate	NA	0.018	Thallium	0.70mg/ITCLP	1.4
Dibenze(a,h)anthracene	8.2	0.055	Methyl parathion	4.6	0.014	Vanadium	0.23mg/ITCLP	4.3
Dibenze(a,e)pyrene	NA	0.061	Naphthalene	5.6	0.059	Zinc	5.3mg/ITCLP	2.61
m-Dichlorobenzene	6	0.36	2-Naphthylamine	NA	0.52			
o-Dichlorobenzene	6	0.088	o-Nitroaniline	14	0.27			
p-Dichlorobenzene	6	0.09	p-Nitroaniline	28	0.028			
			Nitrobenzene	14	0.068			

(\*) P Cyanides (Total) and Cyanides (Amenable) for nonwastewaters are to be analyzed using SW-846 Method or 9010 or 9012 with

a le size of 10 grams and a distillation time of one hour and 15 minutes.

(\*) Selection of D001 constituents is only required for low TOC ignitable liquids managed in nonCWA facilities.

PLEASE TYPE

5-034-01  
(Form designed for use on elite (12-pitch) typewriter.)

State Form LPC 62 8/81

IL532-0610

EPA Form 8700-22 (Rev. 6-89)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD984766642		Manifest Document No. 187601		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
Generator's Name and Mailing Address OLLPRINT PACKAGING 20 STEWART ADDISON IL 60101				Location If Different				A. Illinois Manifest Document Number ILD09965061 FEE PAID IF APPLICABLE	
4. 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS 630 628-1700				B. Generator's IL ID Number 10430055061				C. Transporter's ID Number UPW151288IL	
5. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC				6. US EPA ID Number SCRO00075150				D. Transporter's Phone ( ) 847 468-6600	
7. Transporter 2 Company Name				8. US EPA ID Number				E. Transporter's ID Number	
9. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 633 E 138TH ST DOLTON, IL 60419				10. US EPA ID Number ILD980613913				F. Transporter's Phone ( )	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
a. RO HAZARDOUS WASTE, SOLID, N.O.S. (PERCHLOROETHYLENE) 9 NA3077 PG III (D039)(ERG#171)				001 DM		000.55 G		I. Waste No. EPA HW Number D039	
b.								EPA HW Number	
c.								EPA HW Number	
d.								EPA HW Number	
J. Additional Description for Materials Listed Above				K. Handling Codes for Wastes Listed Above In Item #14 H041					
15. Special Handling Instructions and Additional Information EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY. SKDOT# A: 1604 B: C: D:									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name Mark Thoms				Signature Mark Thoms				Date Month Day Year 080702	
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name M. WEJCIECHOWSKI				Signature M. Wejciechowski	
18. Transporter 2 Acknowledgement of Receipt of Materials				Printed/Typed Name				Signature	
19. Discrepancy Indication Space				Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.				Date	
Printed/Typed Name C. Mills				Signature C. Mills				Date Month Day Year 081302	

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

A) 3600189/410068

In case of a spill call the Illinois Office of Emergency Response at 217/782-7860 and the National Response Center at 800/424-8802 or 202/426-2675.

# **LAMINATOR OPERATOR - GRADE 2 EVALUATION**

**JOB TITLE:** LAMINATOR OPERATOR - GRADE 2

**DEPARTMENT:** PLANT

**REPORTS TO:** SHIFT SUPERVISOR

**SUPERVISES:** NOT APPLICABLE

**EVALUATION ONLY**

**POSITION OBJECTIVE:** Operate the laminators in order to manufacture products in accordance with customer specifications, quality standards, and performance standards.

**EXCEEDS  
EXPECTATIONS**

**MEETS  
EXPECTATIONS**

**UNACCEPTABLE**

## **Critical Job Functions**

Attendance:

ABSENCES	TARDIES	COMBINED TOTAL
2	1	2.25

1. Implement safe working conditions by:

- A. Learning the hazards associated with your assigned duties.
- B. Following all safety procedures.
- C. Using the proper personal protective equipment.
- D. Reporting any unsafe conditions.
- E. Following good housekeeping practices.
- F. Responsibly managing hazardous waste at the point of generation.
- G. Properly transferring waste from point of generation to the less-than-90-day storage area.
- H. Serving as team leader, per Contingency Plan implementation.

<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

2. Ensure the delivery of quality products by:

- A. Operating laminating equipment as necessary.
- B. Getting first piece approval and line clearance prior to production.
- C. Monitoring quality and making corrections when necessary.
- D. Submitting the required samples to Quality Assurance.
- E. Adhering to Rollprint Quality System procedures.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Perform in a productive efficient manner by:

- A. Setting-up, running, and washing laminators in accordance with specified standards.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	-------------------------------------	--------------------------

Roll print

July 14, 2003 follow up to Howard's  
October 30, 2002

Mark Pederson → EH+S officer

SAA containers - How many opened out of  
how many?  
1 x how many?

↳ Cabinets labeled ~~High~~ Waste but drums  
are not. - Pederson agreed to put labels  
on drums.

American  
Waste  
Products  
Wed - Jan 7  
MacLeod  
Call → →  
66862  
t palmer 263@  
hotmail.com  
Chris Rustick

# Comprehensive Compliance Monitoring and Enforcement Report

Page 2

Report run on: April 28, 2004 - 3:28 PM

This report may contain enforcement sensitive data.

## ROLLPRINT PACKAGING PRODUCTS

Activity Location: IL

ILR000049429

Location: 335 STEWART AVE  
ADDISON, IL 60101

Mailing: 345 STEWART AVE  
ADDISON, IL 60101

County Name/Code: DU PAGE/IL043

### Universes

Generator: LQG  
Transporter:

Full Enforcement: ----  
Operating TSDF: ----  
BOYSNC: X  
SNC: X  
Annual BOY Enf:

Subj CA:  
Subj CA TSD 3004:  
Subj CA TSD Discr:  
Subj CA Non-TSD:  
CA Wrkld:

Perm Prgrs: ----  
Perm Wrkld: ----  
Clos Wrkld: ----  
Pclos Wrkld: ----

Op Pmt GPRA:  
PClos GPRA:  
CA GPRA:  
CA HE EI:  
CA GW EI:

State District: Accessibility: Non-Notifier:

SNY Evaluation 02/05/2003 Act Loc: IL By: EPA Seq #: 001 Person: JLP Branch: Reason: Found Violation: Y

Notes:

Coverage Areas:

Violation Data										Enforcement Data										
Act Loc	C L	P R	Res Type	Per	Branch	Determined Date	Sched Compliance	Actual Compliance	Seq #	Act Loc	Date	Type	Seq #	Docket Number	A G	Res Per	Branch	Proposed Penalty	Final Penalty	Collected Amount
IL			GSQ	LMJ		10/30/2002			E0001	IL	02/19/2004	115	001		E	JLP				
Viol. Notes:																				

Viol. Notes:

CEI Evaluation 10/30/2002 Act Loc: IL By: EPA Seq #: 001 Person: JLP Branch: Reason: Found Violation: Y

Notes:

Coverage Areas:

Violation Data										Enforcement Data										
Act Loc	C L	P R	Res Type	Per	Branch	Determined Date	Sched Compliance	Actual Compliance	Seq #	Act Loc	Date	Type	Seq #	Docket Number	A G	Res Per	Branch	Proposed Penalty	Final Penalty	Collected Amount
IL			GSQ	LMJ		10/30/2002			E0001	IL	02/19/2004	115	001		E	JLP				
Viol. Notes:																				

Viol. Notes:

Total Number of Handlers: 1

Total Number of Activity Locations: 1

\* End of Report \*

# Comprehensive Compliance Monitoring and Enforcement Report

Page 3

Report run on: April 28, 2004 - 3:28 PM

This report may contain enforcement sensitive data.

## Description of codes used on the report:

Universes	Description Of Universes
Operating tsdf	Indicates that the facility is a treatment, storage or land disposal facility subject to any type of enforcement. Then specifies type facility (see LIBST below for further explanation).
PCWrkld	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Post-Closure Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
ClosWrkld	Indicates that the facility is a treatment, storage or land disposal facility which is part of the closure Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
Perm/PC	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Permitting/Closure/Post-Closure Progress universe. It is then specifies type of facility (see LIBST below for further explanation).
PermWrkld	Indicates that the facility is a treatment, storage or land disposal facility which is part of the Permit Workload universe. It is then specifies type of facility (see LIBST below for further explanation).
SubjCA	Indicates that the facility is subject to Corrective Action. ('X' indicates that the facility is in this universe).
CAWrkld	Indicates that the facility is part of the Corrective Action Workload universe. ('X' indicates that the facility is in this universe).
LQG	Indicates that the facility is a Large Quantity Generator. ('X' indicates that the facility is in this universe).
SQG	Indicates that the facility is a Small Quantity Generator. ('X' indicates that the facility is in this universe).
CESQG	Indicates that the facility is a Conditionally Exempt Small Quantity Generator. ('X' indicates that the facility is in this universe). Note: CESQG are not nationally required to notify or obtain an EPA ID. Therefore, the absence of CESQG data for any given state or facility does not indicate a data quality problem.
Transporter	Indicates that the facility transports waste subject to RCRA regulations. ('X' indicates that the facility is in this universe).
SNC	Indicates that the facility is a Significant Non-Complier. ('X' indicates that the facility is in this universe).
BOYSNC	Indicates that the facility was a Significant Non-Complier at the beginning of the fiscal year: Oct 1- Sep 30. ('X' indicates that the facility is in this universe).
<b>LIBST in the above universes indicates:</b>	
L	Land Disposal facility
I	Facility is an Incinerator
B	Facility is a Boiler or Industrial Furnace (BIF)
S	Storage facility
T	Treatment facility

# Comprehensive Compliance Monitoring and Enforcement Report

Page 4

Report run on: April 28, 2004 - 3:28 PM

This report may contain enforcement sensitive data.

## Description of codes used on the report:

ACT LOC	
Act Loc indicates the activity location where the evaluation/inspection was performed, the violation was discovered or the enforcement action was taken.	

Agency indicates the agency performing the evaluation or the enforcement action:	
X-EPA	EPA region performed the evaluation or enforcement action as part of their oversight function.
C-EPA	Contractor working for EPA conducted the evaluation.
B-State	Contractor working for State conducted the evaluation.
EPA	EPA performed the evaluation or enforcement action.
State	State performed the evaluation or enforcement action.

BY	
By indicates the agency who performed the evaluation/inspection.	

FOUND VIOLATION indicated whether or not the evaluation discovered a violation. It will contain the following values:	
Code	Description
Y	indicates that the evaluation did find violations.
N	indicates that the evaluation did not find violations.
U	indicates that it is undetermined at this time. The agency may still be determining whether violations existed.
blank	converted from the previous system which did not have a definitive answer to whether or not violations were found.

Coverage Area/Violation Type	Description
GSQ	GENERATOR-SQG REQUIREMENTS

Enforcement Type	Enforcement Description
115	INFORMATION REQUEST LETTER(3007)



# Comprehensive Compliance Monitoring and Enforcement Report

Report run on: April 28, 2004 - 3:28 PM

Version: 2.0

## User Selection Criteria

Location: Illinois

Group of IDs: Not Selected

Handler Name:

Handler ID: ILR000049429

Universe: All

Sort Order: Region, State, Handler Name

Evaluation Date Range: 10/01/1991 To 04/28/2004

Only Evaluations with Violations: No

Federal facilities only: No

Reason Code: All

Display Code Descriptions: Yes

## Results

Data meeting the criteria you selected follows.

Total Pages: 4

Handler Count: 1

## Report Description

This report provides a complete listing of evaluation, violation and enforcement activities for each Handler. Below the Handler ID information, the data is presented in three sections; evaluations, violations and enforcements. Comments, referred to as Notes, are provided in the respective sections for evaluations and violations. Violation coverage areas are shown horizontally across the page in the evaluation data section. Since evaluations are included regardless of whether or not violations are identified, this report also serves as a useful management tool for tracking progress made towards meeting RECAP commitments.

## Report Information

Name: cmecomp.rdf

Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance

Deployed Date: November 2002

Last Updated: October 2003

Contact: rcrainfo.help@epa.gov

Tables Used: cmecomp, cevaluation\_area, hreport\_univ, aarea, aln\_area\_event, aevent, gpra\_ca, lu\_state, hid\_groups

Libraries: cmedec2.pll

ROLLPRINT PACKAGING PRODUCTS INC.

EMERGENCY RESPONSE

AND


CONTINGENCY PLAN

ROLLPRINT PACKAGING PRODUCTS, INC.  
320 STEWART AVENUE  
ADDISON, IL 60101

REVISED FEBRUARY 26, 2004

POLICY STATEMENT  
EMERGENCY EVACUATION AND CONTINGENCY PLAN

1. Policy. This establishes a firm action plan for responding to unplanned incidents which may result in fire, explosion, chemical release, natural disaster, building collapse, etc. It is the policy of Rollprint Packaging Products, Inc. to provide employees a safe and healthful workplace. In keeping with that policy, we have developed the following Emergency Evacuation and Contingency Plan.
2. Scope. This plan will be reviewed with all employees and contractors. Employees and contractors are expected to fully participate in the implementation and on-going execution of this plan for the health and safety of all. The company will provide the training, materials, and equipment necessary to implement this plan.
3. Plan Elements. The main items addresses by our program are:
  - A. The written plan, beginning with this policy
  - B. Facility Identification
  - C. Emergency Coordinators
  - D. Plan Implementation
  - E. Various Site Plans
  - F. Training
  - G. Inspection
  - H. Emergency Telephone Numbers
  - I. Evacuation Routes
  - J. Emergency Equipment List
4. Plan Distribution. This plan will also be shared with but not limited to the following local agencies:
  - A. Addison Fire Department
  - B. Addison Police Department
  - C. Addison Clinic
  - D. Elmhurst Hospital

  
Signed

3/5/04  
Date

## FACILITY IDENTIFICATION AND GENERAL INFORMATION

1. Rollprint Packaging Products, Inc. is located at 320 Stewart Avenue, Addison, IL 60101, in DuPage County. This location consists of corporate offices and the manufacturing facilities. This facility is located in an industrial setting. Access to the property is through the driveway located on the east side of the facility off of Stewart Avenue. All plant and office doors lock from the outside, but all doors can be opened without keys from the inside of the building.
2. Rollprint Packaging Products, Inc. manufactures flexible and semi-rigid packaging materials for the medical, food, and industrial markets.
3. This action plan consists of specific instructions, routes, forms, inspections, checklists, emergency procedures, and employee training.

### EMERGENCY COORDINATORS

This list is in a priority order for contacting emergency coordinators in case of emergency. If the first named person is not available, contact the second, and then the third, and so on, until someone on the list is contacted.

1. Name: Mark Thoms  
Address: 20W375 Army Trail Blvd.  
City, State, Zip: Addison, IL 60101  
Home Phone: (630) 627-2122      24-Hr: (630) 878-4818  
Work Phone: (630) 628-1700      Extension: 3263
  
2. Name: Joseph Miceli  
Address: 874 Red Clover Dr.  
City, State, Zip: Aurora, IL 60504  
Home Phone: (630) 585-8873  
Work Phone: (630) 628-1700      Extension: 3224

### LIST OF EMERGENCY TELEPHONE NUMBERS

FIRE:	Addison Fire Department	1-630-628-3100
POLICE:	Addison Police Department	1-630-543-3080
DOCTOR:	Addison Medical Center	1-630-543-4040
HOSPITAL:	Elmhurst Memorial Hospital	1-630-833-1400
LOCAL EMERGENCY RESPONSE:	Addison Fire Department	1-630-628-3100
EPA EMERGENCY RESPONSE:		1-800- 424-8802
GAS COMPANY:	NICOR	1-630-544-5707
ELECTRIC COMPANY:	ComEd	1-800-334-7661
WATER COMPANY:	Citizens Utilities of Illinois Water Co.	1-630-628-2601
INSURANCE AGENT:	Alper Services, Inc.	1-312-654-4269
SECURITY SYSTEM:	ADT	1-800-238-2666
	Norcomm Safety & Security Inc.	1-630-832-2417

## CONTINGENCY PLAN IMPLEMENTATION

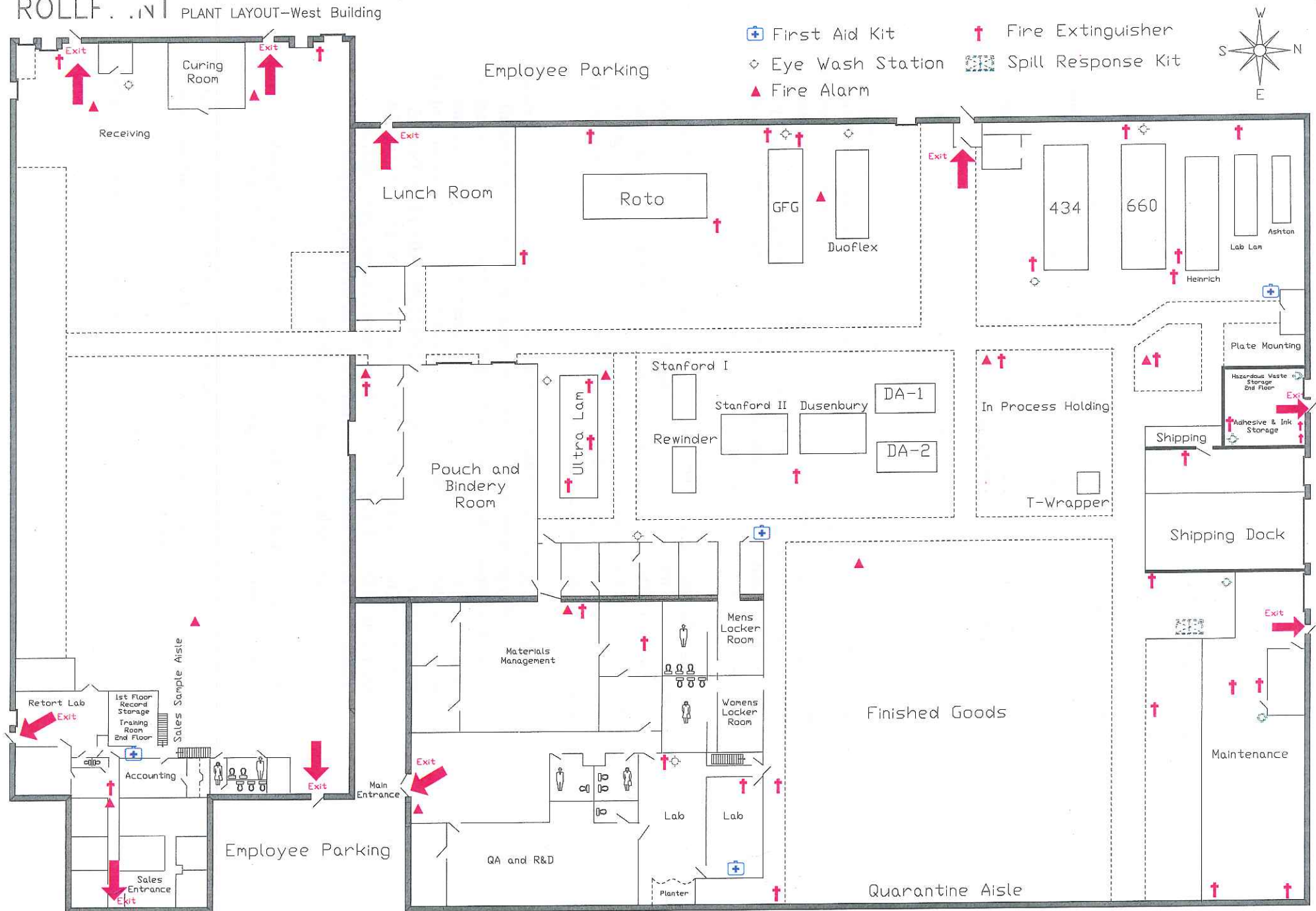
1. Introduction. The contingency plan is intended to minimize hazards to human health and the environment from fire, explosion, or any unplanned sudden or non-sudden release of hazardous material(s) or hazardous material(s) constituents to the air, soil, surface or groundwater. The provisions of the plan must be carried out immediately whenever a release, fire, or explosion which could threaten human health or the environment occurs.
2. Implementation. The contingency plan is implemented when an incident presents an actual or imminent threat to human health and/or the environment. The contingency plan will be implemented under the following criteria:
  - A. Fire and/or Explosion.
    1. An explosion has occurred.
    2. An imminent danger exists when a fire could result in the release of a toxic substance(s) or gas(es)
    3. An imminent danger exists when a fire could cause stored materials to ignite.
    4. An imminent danger exists when a fire occurs that cannot be controlled by fire extinguishers.
    5. An imminent danger exists when a fire has the possibility of spreading to other areas or causing a heat induced explosion with stored materials.
  - B. Spills and/or Toxic Gas Release.
    1. A spill greater than 55 gallons that results in the release of a flammable liquid(s) or flammable vapor(s) causing a fire explosion hazard.
    2. A spill greater than 55 gallons that results in the release of reactive material(s) or toxic material(s) including gas(es).
    3. A spill contained on-site that may potentially cause groundwater and/or soil contamination.
    4. A spill resulting in on-site groundwater and/or soil contamination.
  - C. Other Criteria.
    1. Severe weather such as tornado, flood, or earthquake.
    2. Full or partial building collapse.



TABLE 1. EMERGENCY EQUIPMENT

Emergency Equipment	Location	Physical Description/Capabilities
Fire Extinguishers	See Figure 1	Wall-mounted portable fire fighting apparatus. The following types of fire extinguishers are used: ABC - all types of fires; BC - flammable liquids & electrical fires; CO2 - indoor fires, flammable liquids/gases, and electrical fires.
Spill Control Kit	See Figure 1	Yellow Safety-Kleen cart filled with absorbent material and absorbent pigs used to absorb and contain spill or liquid material.
Fire Detection System	Throughout Facility	Ceiling mounted units which when activated by heat will sound an audible alarm and contact the Fire Department
Fire Alarm Pull Box	See Figure 1	When activated will sound an audible alarm and contact the Fire Department.
Fire Sprinkler System	See Figure 1	Water supplied system capable of extinguishing large fires throughout plant.
Fire Hose	See Figure 1	Varying lengths of hoses which can be connected to water supply systems.
Emergency Eye Wash	See Figure 1	Provide flooding spray of potable water at an angle to flood both eyes simultaneously to flush toxic chemical splashed in eyes.
Telephone System/Public Address System	See Figure 1	Capable of internal & external communications.
Emergency Power/Lighting	See Figure 1	Provides emergency lighting in case of power outage.
Fire Hydrants	See Figure 1	Provides water to local Fire Department in case of large fires.
First Aid Equipment	See Figure 1	Bandages, gauze, hydrogen peroxide and oxygen bottles used to administer first aid.

# ROLLFLOTT PLANT LAYOUT-West Building



### 3. Emergency Response Procedures.

#### A. Definition. Emergency is defined as:

1. An event which can or will result in the loss of life or limb to an employee or visitor. In addition to 2 and 3 below an event may also include building collapse (full or partial), severe weather such as tornado, earthquake, flood, etc.
2. An event where chemicals can or will cause immediate harm to the environment through being released to the air, ground, or water.
3. an event which will cause severe production interruption because of loss of equipment or building.

#### B. Response Procedures. The procedure will be activated when an emergency as defined above or an explosion or fire which cannot be controlled by the use of fire extinguishers occurs. Second, an ambulance will be called when persons are injured. Third, the emergency coordinator will be notified. In all other cases, the emergency coordinator will be contacted first and all subsequent actions will be directed by the emergency coordinator or his/her appointed representative. Facility employees are notified first, then state, and federal agencies are notified.

#### C. Emergency Response Team. The emergency response team will respond to an emergency involving fire, explosion, building collapse, chemical release, injuries and severe weather. The emergency response team consists of a team leader and team members. The initial response will be by members in whose area the emergency arises. Until the emergency coordinator can be contacted, the person with the most seniority will act as the scene leader.

1. Emergency Coordinator. At all times, there must be at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures. The emergency coordinator must be thoroughly familiar with all aspects of the company contingency plan, all operations and activities at the location, characteristics of waste handled, and the location of all records within the company's layout. **IN ADDITION, THIS PERSON HAS THE AUTHORITY TO COMMIT THE RESOURCES NEEDED TO CARRY OUT THE CONTINGENCY PLAN.** When there is an emergency spill or release of hazardous waste or material(s) at any location, the emergency coordinator should follow the following guidelines:

##### A. Whenever there is an imminent or actual emergency, the emergency coordinator or alternate emergency coordinator will immediately:

- i. Activate the internal facility alert or communication system(s) to notify all plant employees. This procedure could already be in process.
- II. Notify appropriate local, state and federal agencies if their help is needed

- B. Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, area, and extent of any released materials. He/she may do this by observation or review of facility records.
- C. Concurrently the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that were generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat induced explosions).
- D. If the emergency coordinator determines the facility had a release, fire or explosion which could threaten human health or the environment outside the facility, he/she must report their findings as follows:
  - I. If his assessment indicates that evacuation of local areas may be advisable, he/she must immediately notify the fire department to help the appropriate officials decide whether local areas should be evacuated.
  - II. He/she must immediately notify either the government official designated as the on-scene coordinator for that geographical area or the National Response Center using their 24 hour toll-free number 1-800- 424-8802. The report must include the following:
    - A) Name and telephone number of the reporter.
    - B) Name and address of the facility.
    - C) Time and type of incident.
    - D) Name and quantity of material(s) involved, to the extent known.
    - E) the extent of injuries, if any.
    - F) The possible hazards to human health and the environment outside the facility.
- E. During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other areas of the facility. These measures must include stopping processes and operations, collecting and containing released waste, and removing or isolating container.
- F. If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
- G. Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste or

material(s), contaminated soil or surface water, or any other material(s) that resulted from a release, fire, or explosion at the facility.

- H. The emergency coordinator must ensure that in the affected area(s) of the facility:
  - I. No waste that may be incompatible with the released material(s) is treated, stored, or disposed of until clean-up procedures are completed.
  - II. All emergency equipment, listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

- 2. Communication System. The telephone system is an Executone Digital System. Any phone can reach another phone in the building by dialing that extension. The phone system is also equipped with a paging system which can be activated from any phone by pressing the "Page" button or dialing "60."

The alarm system is electronic with a battery back-up which is used for security as well as fire. The system is monitored by ADT, Inc. Telephone number is (888) 238-2666. The alarm system signal, when set off, makes a continuous pulsating high pitched horn sound. The signal given off when the sprinkler system is activated makes a continuous bell clanging noise.

- 3. Evacuation Plan. It is the policy of the company that an evacuation of employees shall be enacted whenever there is a threat to their health or a threat of injury because of an emergency condition existing in the facility. The emergency coordinator is authorized to enact the evacuation plan for a particular room, building, or facility. In any evacuation, police and fire departments will be notified

- a. The guidelines include but are not limited to the following conditions:
  - i. When more than 55 gallons of a flammable liquid is released in an area other than an explosion-proof room.
  - ii. When more than 55 gallons of a flammable liquid is released in an explosion-proof room and the doors have been left open to allow the vapors to escape.
  - iii. When more than 55 gallons of a combustible liquid is released in an area other than an explosion-proof room.
  - iv. When any strong acid at the pH level of 2 or less or a strong caustic at the pH level of 12 or more is released in any quantity that could endanger employees.
  - v. When any toxic material is released causing employee exposures to exceed the TLV or IDLH level as established by ACGIH or NIOSH.

- vi. When an explosion potential becomes evident, employees in the immediate and adjacent building(s) are to be evacuated.
- vii. When any unfriendly fire is discovered, the building must be evacuated except for the emergency response team.
- b. The evacuation routes are designated on the attached facility diagram. The primary evacuation route for all employees is the nearest exit to them. All employees are trained on the location of all exit routes and informed that in the event of an emergency, they should go to the nearest exit. In the event that particular exit is not accessible, employees are knowledgeable on all exit routes and will choose the next closest exit.
- c. Upon evacuation of the facility, employees will gather either in the parking lot behind the 320 Building or on Stewart Avenue (which ever is closer), and supervisors will be responsible for taking a head count of their respective employees.

#### 4. Coordination Agreements.

- a. In the event of an emergency, arrangements have been made with various local authorities. These authorities are outlined below. Each has been provided with a copy of this contingency plan as well as detailed information regarding Facility Operations, Facility Layout and General Hazards specific to the facility.
- B. Distribution of this plan is to:
  - I. Addison Fire Protection District #1
  - II. Addison Police Department
  - III. Addison Medical Center
  - IV. Elmhurst Hospital

#### 5. Required Reports.

- a. If the emergency coordinator determines that the facility had a release, fire, or explosion which could threaten human health or the environment outside the facility, the emergency coordinator must report his findings as follows:
  - i. As soon as practical, notify the National Response Center (1-800-424-8804) and the EPA Regional Administrator.
  - ii. Specific reporting procedures usually vary between states, the agencies stated above should be the starting points. While in contact with those agencies, inquire as to other agencies which must be notified of the emergency and ask for the phone numbers of those

agencies. Once the reporting requirements of those agencies are known, incorporate those requirements into this section.

Other agencies to be Notified:

Illinois Environmental Protection Agency  
Bureau of Land  
1021 North Grand Avenue East  
Springfield, IL 62702

iii. The phone call report is to follow the form as stated below.

- a) Your name.
- b) The telephone number your calling from.
- c) Your permanent telephone number.
- d) The name of the facility involved.
- e) Address of the facility.
- f) Time of the incident.
- g) Type of incident (fire, release, explosion).
- h) To the extent known, identity and quantity of material involved.
- i) The extent of injuries, if any.
- j) The possible hazards to human health or the environment outside the facility.

iv. The operating records of the plant or facility must also include those items stated in iii.a) through iii.b).

v. A written report of the incident must be submitted to the EPA Regional Administrator within 15 days. The report will include current information on items stated in iii.a) through iii.b).

VI. The emergency coordinator will maintain a permanent record of the incident.



## TRAINING

1. Emergency coordinator/Team Leader. The Emergency Coordinator and the alternate coordinator will be trained and will understand all facets of this plan, facilities, production process, and chemicals and materials used in the process and stored on site.
2. Employees.
  - A. Employees will be made aware of the existence of this plan, the purpose of the plan, and their role in the execution of the plan as stated below.
    1. The location of all fire suppression equipment.
    2. Meaning of various alarm activations.
    3. Totally knowledgeable on evacuation procedures.

## FIRE EXTINGUISHER INSPECTION CHECKLIST

1. Is the extinguisher clean and well cared for?
  2. Has the extinguisher been charged and hydrostatically tested within the prescribed time period and tagged to display the dates?
  3. If a seal is provided, is the seal intact?
  4. Is the discharge orifice clear and unobstructed?
  5. Is there an indication that the cap, if any, may be cross threaded on the collar or that threads are corroded?
  6. Is the shell of the extinguisher corroded, damaged, or dented in any way to suggest possible structural weakness?
  7. Are connections between the hose, the shell and the nozzle secure?
  8. If the extinguisher is a pump operated type, does the pump shaft operate freely?
  9. If the location of the extinguisher readily accessible and plainly indicated so as to be visible from a distance?
  10. If the extinguisher is subject to freezing conditions, is it protected from temperature extremes?
  11. Is the mounting bracket or hanger fastened securely so the extinguisher is well supported?
- Is the extinguisher located too close to the hazard, which it is to protect, so that it could not be reached in a fire?



ADDISON MEDICAL CENTER  
501 S. GRACE STREET, ADDISON, IL 60101-4389  
630.543.4040 FAX 630.543.1050

ANTHONY G. TESMOND, D. O.  
MEDICAL DIRECTOR

ADRIENNE BAKSINSKI, D. O.  
ASSISTANT MEDICAL DIRECTOR  
OCCUPATIONAL MEDICINE  
FAMILY PRACTICE

---

**MEDICAL SPECIALTIES**

CARDIOLOGY  
GENERAL SURGERY  
HAND SURGERY  
ORTHOPEDIC SURGERY  
PLASTIC & RECONSTRUCTIVE  
SURGERY

March 8, 2004

Mr. Bob Ferencz  
ROLLPRINT  
320 Stewart Ave.  
Addison, IL 60101

Dear Mr. Ferencz,

Thank you for providing me a copy of Rollprint's Emergency Response and Contingency Plan.

This letter will serve as confirmation that Addison Medical Center will continue to provide emergency medical services for your employees.

Thank you again for allowing us to continue to provide these services to you in an on-going effort to meet your occupational medicine needs.

Should I be of any further assistance to you, please feel free to contact me.

Sincerely,

AGT esmond/ (ESP)

Anthony G. Tesmond, DO  
AGT:rr



# ADDISON FIRE PROTECTION DISTRICT #1

---

10 S. Addison Road, Addison, Illinois 60101-3870  
Business Phone: (630)628-3100 • Fax: (630)543-9742

## BOARD OF TRUSTEES

Patrick A. Amerena  
President  
Anthony J. LaRocca  
Treasurer  
Michael J. Super  
Secretary

## ADMINISTRATION

Timothy F. Deutschle  
Fire Chief

John R. Kreft  
Deputy Chief

February 24, 2004

Mr. Mark Pederson  
Rollprint Packaging Products, Inc.  
320 Stewart Ave.  
Addison, IL 60101

Re: Emergency Response and Contingency Plan

Dear Mr. Pederson:

The purpose of this letter is to provide verification that the Addison Fire Protection District will respond to a request for assistance at an emergency in your facility.

The Addison Fire Protection District's capabilities and training are in the areas of fire suppression, emergency medical care and transportation, hazardous material response, and technical rescue. Technical rescue includes high angle, confined space, structural collapse, and trench rescue response capabilities.

If you require any additional information or have further questions, please feel free to call me at (630) 628-3100.

Sincerely,  
ADDISON FIRE PROTECTION DISTRICT #1

A handwritten signature in cursive script that reads "Leigh Fabbri".

Leigh Fabbri  
Captain, Fire Prevention Coordinator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE-9J

**FEB 19 2004**

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**IN THE MATTER OF:**

Rollprint Packaging Products, Inc.  
320 South Stewart Ave / 335 South Stewart Ave.  
Addison, IL 60101

U.S. EPA ID No.:               ILD 984 766 642  
                                      ILR 000 049 429

**ATTENTION:**               Mark Pederson  
                                      Environmental/Health & Safety Officer

**REQUEST FOR INFORMATION**

By this letter, the United States Environmental Protection Agency (U.S. EPA) requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of U.S. EPA to require you to submit certain information.

This request requires Rollprint Packaging Products, Inc. to submit certain information relating to its operations located at 320 South Stewart Ave. and 335 South Stewart Ave, Addison, Illinois 60101. We are requiring this information for purposes of enforcing Section 3002 of RCRA and its implementing regulations. Attachment 1 specifies the information you must submit. You must submit this information within 21 calendar days of receiving this request to the U.S. EPA, Attention: Jamie Paulin, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

Rollprint Packaging Products, Inc. must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341.

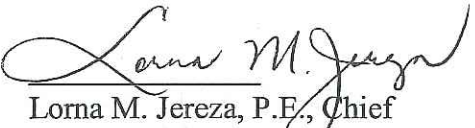
We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Rollprint Packaging Products Inc. to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Jamie Paulin, of my staff, at (312) 886-1771.

2/19/04  
Date

  
Lorna M. Jereza, P.E., Chief  
Enforcement and Compliance Branch  
Compliance Section 1

#### Attachment

cc: Todd

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		<p>A. Received by (Please Print Clearly) B. Date of Delivery 2/23/04</p>	
<p>1. Article Addressed to:</p> <p>ROLLPRINT PACKAGING PRODUCTS INC Mark Pederson Environmental/Health &amp; Safety Officer 320 SOUTH STEWART AVE ADDISON IL 60101</p>		<p>C. Signature X  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7001 0320 0005 8910 4655</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
		<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.         </p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	



## ATTACHMENT 1

**Instructions:** You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

### Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified, business telephone number for each individual identified, and the number of years that each identified individual has worked at Rollprint Packaging Products, Inc.
2. During the October 30, 2002 inspection of Rollprint Packaging Products, Inc., U.S. EPA, identified missing inspection logs during the weeks of, 5/8/02, 5/20/02, 5/29/02, 6/12/02, 7/10/02, 7/24/02, 8/8/02, 8/22/02, 9/11/02, 9/19/02 and 10/2/02, however during the July 14, 2003 inspection, weekly inspection logs were accounted for up to July 2003. Provide copies of the weekly inspection logs from July 2003 up to February 2004.
3. During the July 14, 2003 inspection of Rollprint Packaging Products, Inc., U.S. EPA identified no immediate access to an internal alarm or other emergency communication device provided to employees when hazardous waste is being handled in the 90 day storage area. Provide documentation and the date of the installation of a handle on the inside of the steel fire door. Provide documentation that the fire door will not activate until a fuse at the top of the door is tripped by an approaching fire. Provide documentation and the date of installation of a wall mounted phone nearer to the fire door.
4. During both the October 30, 2002 and the July 14, 2003 inspections of Rollprint Packaging Products, Inc., U.S. EPA identified that the Contingency Plan did not describe the arrangements with police and fire departments, hospitals, contractors and emergency response teams. Provide a copy of the Contingency Plan along with a copy of the arrangements with the police and fire departments, hospitals, contractors and emergency response teams.
5. During the October 30, 2002 inspection of Rollprint Packaging Products, Inc., U.S. EPA identified that the Rollprint Packaging Products, Inc. emergency coordinators and response team members do not receive annual training regarding hazardous waste management. Provide these specific training records of the emergency coordinators and response team members.
6. During the October 30, 2002 inspection of Rollprint Packaging Products, Inc., U.S. EPA identified satellite containers being stored in labeled fireproof metal cabinets not marked or labeled with the words, "Hazardous Waste." Provide photograph documentation showing that each container, stored inside the fireproof metal cabinets, is now being properly labeled.

7. During the October 30, 2002 inspection of Rollprint Packaging Products, Inc., U.S. EPA identified that the Land Disposal Restriction (LDR) form for Manifest WIL231840 did not have the wastewater/nonwastewater category completed. Provide copies of this LDR that accompanied manifest, WIL231840, shipped on 3/10/2002.
8. During the October 30, 2002 inspection of Rollprint Packaging Products, Inc., U.S. EPA identified that the emergency coordinators' names and telephone numbers, along with the location of the fire extinguishers, spill control equipment, and fire alarms were not posted next to the telephone at 335 South Stewart per 40 CFR 262.34 (d)(5)(ii). Provide documentation showing that this has been corrected.
9. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.





## Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist  
☐ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☒ Information Request  
☐ Pre-Filing and Opportunity to Confer  
☐ State Notification of Enforcement Action

Facility Name: Rollprint Packaging Products Inc

Facility Location: 320 South Stewart Ave / 335 South Stewart Ave.

City: Addison State: IL

U.S. EPA ID# ILD 984 766642 / ILR 000 049 429

Assigned Staff Jamie Paulin Phone: 6-1771

Name	Signature	Date
Author	<i>Jamie Paulin</i>	<i>2/19/04</i>
Regional Counsel	<i>cc 2/19/04 e-mail (ORC comment) attached</i>	
Section Chief	<i>Laura M. Jan</i>	<i>2/19/04</i>
Branch Chief		

### Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
  - One copy for the assigned staff;
  - One copy for the section file;
  - One copy for the branch file; and
  - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.  
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

**Jamie Paulin**

02/19/04 04:23 PM

To: Michael Berman/R5/USEPA/US@EPA  
cc: Lorna Jereza/R5/USEPA/US@EPA  
Subject: Re: Rollprint Approval

Hi Mike!

In the original inspection report written by Howard Caine, on page one, in the purpose of inspection section, Howard mentions that the company was given the Small Business Information Sheet.

So that is good! Feel free to contact me if you have any other questions.

Thanks for your help and talk to you soon,

Jamie

Jamie L. Paulin

Chemist

U.S. Environmental Protection Agency, Region 5

Waste, Pesticides, Toxics Division

Enforcement and Compliance Assurance Branch

77 West Jackson Blvd.

Chicago, IL 60604-3590

phone: 312-886-1771

fax: 312-353-4342

Michael Berman

**Michael Berman**

02/19/04 04:03 PM

To: Jamie Paulin/R5/USEPA/US@EPA  
cc:  
Subject: Re: Rollprint Approval

You might want to note in the letter that you are including a SBREFA fact sheet. Otherwise I approve the 3007 information request.

Jamie Paulin

**Jamie Paulin**

02/19/2004 01:37 PM

To: Michael Berman/R5/USEPA/US@EPA  
cc:  
Subject: Rollprint Approval

Hi Mike!

Would it be possible for you to email me an approval response for the 3007 information request for Rollprint Packaging Products Inc?

Once we get the electronic approval from you, my section chief will approve it, and then we can send it out to the generator.

Thank you so much for your help! I greatly appreciate it!

Jamie



Rollprint.3007.wpd

---

Jamie L. Paulin  
Chemist  
U.S. Environmental Protection Agency, Region 5  
Waste, Pesticides, Toxics Division  
Enforcement and Compliance Assurance Branch  
77 West Jackson Blvd.  
Chicago, IL 60604-3590  
phone: 312-886-1771  
fax: 312-353-4342



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

February 16, 2004

REPLY TO THE ATTENTION OF:

C-14J

**VIA FEDERAL EXPRESS**

Mark E. Pederson  
Environmental, Health & Safety Manager  
Rollprint Packaging Products, Inc.  
320 Stewart Avenue  
Addison, Illinois 60101-3310

Re: Rollprint Packaging Products, Inc.

Dear Mr. Pederson:

Enclosed please find two copies of modified pages 6 and 7 for the Consent Agreement and Final Order (CAFO) in the matter of Rollprint Packaging Products, Inc (Rollprint). Please insert the pages into the two copies of the CAFO previously sent to you. The new pages contain the changes we discussed on February 16, 2004. Have both copies of the CAFO signed by a party authorized by Rollprint to sign the agreement on its behalf, and return both copies to me. My address is:

Michael Berman (C-14J)  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3590

If you have any questions, please telephone me at (312) 886-6837 or Jamie Paulin at (312) 886-1771. Thank you for your cooperation on this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Michael Berman".

Michael Berman  
Associate Regional Counsel

Enclosure

bcc: Jamie Paulin (DE-9J)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO IL 60604-3590

FEB 01 2005

REPLY TO THE ATTENTION OF

C-14J

VIA FEDERAL EXPRESS

Mark E. Pederson  
Environmental, Health & Safety Manager  
Rollprint Packaging Products, Inc.  
320 Stewart Avenue  
Addison, Illinois 60101-3310

Re: Rollprint Packaging Products, Inc.

Dear Mr. Pederson:

Enclosed please find two copies of a Consent Agreement and Final Order in the matter of Rollprint Packaging Products, Inc (Rollprint). One signed copy will be returned to you after the documents are executed. The agreement contains the terms previously discussed to resolve this matter. Please review the agreement, have both copies signed by a party authorized by Rollprint to sign the agreement on its behalf, and return both copies to me. My address is:

Michael Berman (C-14J)  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3590

If you have any questions, please telephone me at (312) 886-6837 or Jamie Paulin at (312) 886-1771. Thank you for your prompt attention to this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Michael Berman".

Michael Berman  
Associate Regional Counsel

Enclosure

bcc: Jamie Paulin (DE-9J)

**Michael Cunningham**

10/31/02 02:51 PM

To: Howard Caine/R5/USEPA/US@EPA  
cc:  
Subject: Inspections

----- Forwarded by Michael Cunningham/R5/USEPA/US on 10/31/02 02:54 PM -----



**Mark Pederson**  
<markpederson@roll  
print.com>

10/31/02 09:12 AM

To: Michael Cunningham/R5/USEPA/US@EPA  
cc:  
Subject: Inspections

Mike, just had your co-worker in here, Mr Howard Caine, for a RCRA inspection. Don't want to get you in trouble on this, but, there were some areas of concern identified during the inspection, and any information you have on the direction he will take will be very much appreciated. I will keep it hush hush. I consider them to be minor infractions such as labels of waste bulbs and open containers at satellite points, issues easily resolved and in fact already have been. Let me know if you find anything out.

Mark Pederson  
EHS Manager  
Rollprint Packaging Products, Inc.



Regulation	RCRA CESQG INSPECTION CHECKLIST (PART 721.105(g))	Violation
2(f)	<b>Section 721.105 Special Requirements for Hazardous Waste Generated by Conditionally-Exempt Small-Quantity Generators (&lt;100 Kg/mo.)</b> Has the owner/operator provided appropriate documentation to demonstrate that the material is not a solid waste or is conditionally exempt from regulation? Yes _____ No _____ N/A <u>X</u>	721.102(f)
721.105	Are any of the following applicable: a) The generator has generated 1 or more Kg of hazardous waste in a calendar month? Yes <u>X</u> No _____ N/A _____ b) The generator has generated greater than 100 Kg of any residue or contaminated soil, waste or other debris resulting from the clean-up of a spill of hazardous waste? Yes <u>X</u> No _____ N/A <u>X</u> c) The generator has generated greater than 100 Kg of hazardous waste in a calendar month? Yes _____ No _____ N/A _____ d) The generator has accumulated greater than 1000 Kg of hazardous waste on site at any one time? Yes <u>X</u> No _____ N/A _____  <b>Note:</b> If the answer to any of the above questions is "Yes", the firm is a generator of hazardous fully subject to regulation under the applicable parts of 35 IAC Parts 700 through 728 and the notification requirements of Section 3010 of RCRA. Complete the appropriate checklists.	
722.111	Has the generator made a proper hazardous waste determination pursuant to Section 722.111? <u>KNOWLEDGE</u> Yes _____ No _____ N/A _____	722.111
721.105(g)(3)	Has the owner/operator treated or disposed of the hazardous waste on-site? Yes _____ No <u>X</u> N/A _____	
721.105(g)(3)	Has the owner/operator ensured delivery to a permitted off-site treatment, storage or disposal facility pursuant to Section 721.105(f)(3) or 721.105(g)(3)? Yes <u>X</u> No _____ N/A _____	721.105(g)(3)
721.105(j)	<b>Note:</b> A conditionally-exempt small-quantity generator who mixes its hazardous waste with used oil which is destined to be burned for energy recovery must comply with the requirements in Part 739.  <b>Comments:</b>	

JUST SHIPPED  
OFF 7 DRUMS  
GENERATE ABOUT 1 DRUM  
PER MONTH

TM:jab\721cesq.wpd



Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator:	
722.123(a)	- signed the certificate by hand? Yes <u>X</u> No _____ N/A _____ - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <u>X</u> No _____ N/A _____ - retained one copy as required by Section 722.140(a)? Yes <u>X</u> No _____ N/A _____ - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <u>X</u> No _____ N/A _____	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <u>X</u> No _____ N/A _____	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes _____ No _____ N/A <u>X</u>	722.123(c)
	<b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b> <i>WASTE FILLED UP</i> Is there any hazardous waste ready for transport off-site? Yes _____ No _____ N/A <u>X</u> If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No _____ N/A _____	
722.134(c)	<b>Section 722.134 Accumulation Time</b> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste marking the containers with the words hazardous waste or other words to identify the contents? Yes _____ No <u>X</u> N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No _____ N/A <u>X</u> If there are more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <u>X</u> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <u>X</u>	722.134(c)
722.134(d)	Has the generator complied with the following requirements: Yes _____ No _____ N/A <u>X</u> <b>Note:</b> If the quantity of hazardous waste on-site ever exceeds 6000 kg, the facility is also a storage facility subject to full regulation under Parts 724 and 725 and the permit requirements under Part 703. Does the facility accumulate hazardous waste in containers? Yes <u>X</u> No _____ N/A _____ If "No", go to Subpart J.	722.134(d)
	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b> <i>NO WASTE ON-SITE</i>	
(722.134a2)	Is the accumulation start date marked on each container? Yes _____ No _____ N/A _____	
(722.134a3)	Is each container marked with the words "Hazardous Waste"? Yes _____ No _____ N/A _____	
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A _____	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
75.272)	Is the waste compatible with the container and/or liner? Yes <u>X</u> No _____ N/A _____	
273a)	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes _____ No _____ N/A _____	
(725.273b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No _____ N/A _____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes _____ No _____ N/A _____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes _____ No _____ N/A _____	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes _____ No _____ N/A _____ Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No _____ N/A _____  Note: If "No", go to Subpart C.  COMMENTS:	
<p><b>SUBPART J: TANK SYSTEMS</b></p> <p><b>Section 725.301 Generators of 100 to 1000 kg/mo.</b></p> <p>(722.134a2) Is each tank marked with the words "Hazardous Waste"? Yes _____ No _____ N/A _____</p> <p>(725.301b1) Is the generator in compliance with the treatment or storage of hazardous waste in tanks as referenced in Section 725.117(b)? Yes _____ No _____ N/A _____</p> <p>(725.301b2) Have hazardous wastes or treatment reagents been placed in a tank causing the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life? Yes _____ No _____ N/A _____</p> <p>(725.301b3) Unless a tank is equipped with drainage control or a diversion structure, do any uncovered tanks have at least 2 feet of freeboard? Yes _____ No _____ N/A _____</p> <p>(725.301b4) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow (i.e. waste feed cutoff system or by-pass system to a stand-by tank)? Yes _____ No _____ N/A _____</p>		

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
75.301c)	<p>Is the generator inspecting, where present, the following:</p> <p>1) discharge control equipment at least once each operating day?  Yes _____ No _____ N/A _____</p> <p>2) data from monitoring equipment at least once each operating day?  Yes _____ No _____ N/A _____</p> <p>3) the level of the waste in the tank at least once each operating day?  Yes _____ No _____ N/A _____</p> <p>4) physical evidence of corrosion at least weekly?  Yes _____ No _____ N/A _____</p> <p>5) discharge confinement structures to detect erosion or leaking at least weekly?  Yes _____ No _____ N/A _____</p>	N/A
(725.301d)	<p>Has the generator removed all hazardous waste from tanks and associated equipment and structures upon closure of the facility?  Yes _____ No _____ N/A _____</p>	
(725.301e)	<p>If ignitable or reactive wastes are stored in tanks, is the generator in compliance with Section 725.301(e)?  Yes _____ No _____ N/A _____</p>	
(725.301f)	<p>Is the generator in compliance with the regulations concerning incompatible wastes in Section 725.301(f)?  Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
	<p><b>SUBPART C: PREPAREDNESS AND PREVENTION</b></p>	
(725.131)	<p>Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?  Yes _____ No <u>X</u> _____ N/A _____</p>	
(725.132)	<p>Is the facility equipped with the following if necessary:</p> <p>a) an internal communication or alarm system(s)?  Yes <u>X</u> _____ No _____ N/A _____</p> <p>b) a telephone or other device to summon emergency assistance from local authorities?  Yes <u>X</u> _____ No _____ N/A _____</p> <p>c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?  Yes <u>X</u> _____ No _____ N/A _____</p> <p>d) water at adequate volume and pressure for fire control?  Yes <u>X</u> _____ No _____ N/A _____</p>	
(725.133)	<p>Is the facility testing and maintaining communication/alarm systems, fire protection equipment, spill control equipment and decontamination equipment?  Yes <u>X</u> _____ No _____ N/A _____</p>	
(725.134)	<p>a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device?  Yes <u>X</u> _____ No _____ N/A _____</p> <p>b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance?  Yes <u>X</u> _____ No _____ N/A _____</p>	
135)	<p>Is the facility maintaining adequate aisle space?  Yes <u>X</u> _____ No _____ N/A _____</p>	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> <li>arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(728.107a4)	<p><b>Section 728.107 Waste Analysis and Recordkeeping</b></p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Is the plan on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	
722.134(d)(5)	<p>A) Is there at least one employee on site or on call with the responsibility to coordinate all emergency response measures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>B) Is the following information posted next to the telephone:</p> <ul style="list-style-type: none"> <li>the name and telephone number of the emergency coordinator? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>the location of fire extinguishers and spill control equipment and, if present, fire alarms? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>the number of the fire department unless the facility has a direct alarm? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> <p>C) Have employees received the proper waste handling and emergency procedures training relevant to their positions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) If there have been any emergencies that required a response, did the emergency coordinator comply with the requirements of Section 722.134(d)(5)(D)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> A small-quantity generator who must transport the waste over a distance of 200 miles or more for treatment, storage or disposal may accumulate waste on-site for up to 270 days without a permit provided that the generator complies with the requirements of subsection (d).</p> <p><b>SUBPART D: RECORDKEEPING AND REPORTING</b></p> <p><b>Section 722.140 Recordkeeping</b></p>	722.134(d)(5)
722.140(a)	<p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> <li>a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	722.140(a)
722.140(c)	<p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> <li>copies of test results, waste analyses or other determinations made in accordance with Section 722.111? <i>KNOWLEDGE OF WASTE</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	722.140(c)

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <u>X</u>	722.140(d)
722.142(b)	<b>Section 722.142 Exception Reporting</b> Has the generator filed an exception report if a signed copy of the manifest has not been received within 60 days of the date of delivery to the transporter? Yes _____ No _____ N/A <u>X</u>	722.142(b)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A <u>X</u>	722.143
	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b>  Is the generator an exporter of hazardous waste? Yes _____ No _____ N/A <u>X</u> If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A <u>X</u>	
	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b>  Is the generator an importer of hazardous waste? Yes _____ No _____ N/A <u>X</u> If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A <u>X</u>	
	<b>SUBPART G: FARMERS</b>  Is the generator a farmer? Yes _____ No _____ N/A <u>X</u> If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A <u>X</u>	
	COMMENTS:	

TM:jab\722small.wpd





Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
723(c)	<p>— has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	722.123(c)
	<p><b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b> <i>JUST SHIPPED OFF TODAY</i></p> <p>Is there any hazardous waste ready for transport off-site?</p> <p>Yes _____ No <u>X</u> N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C?</p> <p>Yes _____ No _____ N/A _____</p>	
722.134(a)	<p><b>Section 722.134 Accumulation Time</b> <i>NO WASTE IN 90 DAY STORAGE</i></p> <p>Has the generator complied with the following requirements:</p> <p>Yes _____ No _____ N/A _____</p>	722.134(a)
722.134(a)(1)	<p>A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I?</p> <p>Yes _____ No _____ N/A _____</p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J (except Sections 725.297(c) and 725.300)?</p> <p>Yes _____ No _____ N/A _____</p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A _____</p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A _____</p>	
722.134(a)(2)	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes _____ No _____ N/A _____</p>	
722.134(a)(3)	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes _____ No _____ N/A _____</p>	
722.134(a)(4)	<p>Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers?</p> <p>Yes <u>X</u> No _____ N/A _____</p> <p>If "No", go to Subpart J.</p>	
	<p><b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b></p> <p>Has the generator closed an accumulation area? <i>NO WASTE IN 90 DAY STORAGE</i></p> <p>Yes _____ No _____ N/A _____</p>	
(725.211) (725.214)	<p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	
(725.271)	<p>If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	
(725.272)	<p>Is the waste compatible with the container and/or liner?</p> <p>Yes <u>X</u> No _____ N/A _____</p>	
723a)	<p>Are containers of hazardous waste always closed except to remove or add waste during accumulation?</p> <p>Yes _____ No <u>X</u> N/A _____</p> <p><i>SATURDAY OPEN</i></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
273b)	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? <i>CONTAINERS OPEN IN CABINETS</i> Yes _____ No <u>X</u> N/A _____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? <i>A WORKS MISSED</i> Yes _____ No <u>X</u> N/A _____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <u>X</u> No _____ N/A _____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <u>X</u> No _____ N/A _____ <b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <u>X</u> No _____ N/A _____ COMMENTS:	
	Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No _____ N/A _____ <i>N/A</i> <b>Note:</b> If "No", go to Subpart C.	
	<b>SUBPART J: TANK SYSTEMS</b>	
	Has the generator closed an accumulation area? Yes _____ No _____ N/A _____	
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A _____	
(725.290)	Does the facility accumulate or treat hazardous waste in tanks? Yes _____ No _____ N/A _____ <b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J.	
	a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	
(725.291a)	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
291b)	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____</p> <p>2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____</p> <p>3) existing corrosion protection measures? Yes _____ No _____ N/A _____</p> <p>4) documented age of the tank system? Yes _____ No _____ N/A _____</p> <p>5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____</p> <p>*IRPE = Independent Registered Professional Engineer</p>	N/A
(725.291c)	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	
(725.292a)	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____</p> <p>Does the assessment include, at a minimum, the following:</p> <p>1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____</p> <p>2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____</p> <p>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____</p> <p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____</p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____</p>	
(725.292g)	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____</p>	
(725.293a)	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
.293b)	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?  Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?  Yes _____ No _____ N/A _____</p>	N/A
(725.293c)	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> <li>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure?  Yes _____ No _____ N/A _____</li> <li>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift?  Yes _____ No _____ N/A _____</li> <li>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours?  Yes _____ No _____ N/A _____</li> <li>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?  Yes _____ No _____ N/A _____</li> </ol> <p>and  is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293d)	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> <li>1) a liner (external to the tank); or</li> <li>2) a vault; or</li> <li>3) a double-walled tank; or</li> <li>4) an equivalent device (approved by the Board)?  Yes _____ No _____ N/A _____</li> </ol>	
(725.293e)	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)?  Yes _____ No _____ N/A _____</p>	
(725.293f)	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?  Yes _____ No _____ N/A _____</p> <p>If "No":</p> <ol style="list-style-type: none"> <li>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?  Yes _____ No _____ N/A _____</li> <li>2) Are welded flanges, joints and connections inspected daily?  Yes _____ No _____ N/A _____</li> <li>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?  Yes _____ No _____ N/A _____</li> <li>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?  Yes _____ No _____ N/A _____</li> </ol>	
(725.293i)	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <ol style="list-style-type: none"> <li>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?  Yes _____ No _____ N/A _____</li> <li>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?  Yes _____ No _____ N/A _____</li> <li>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?  Yes _____ No _____ N/A _____</li> </ol> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
294a)	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A _____	N/A
(725.294b)	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes _____ No _____ N/A _____ 2) overfill prevention controls? Yes _____ No _____ N/A _____ 3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A _____	
(725.294c)	Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295a)	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes _____ No _____ N/A _____ 2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A _____ 3) data from monitoring equipment? Yes _____ No _____ N/A _____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A _____	
(725.295b)	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A _____	
(725.295c)	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No _____ N/A _____	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____ b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____	
(725.296d)	d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____ d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____	
	Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
296e)	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system?  Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?  Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair?  Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?  Yes _____ No _____ N/A _____</p>	N/A
(725.296f)	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297a)	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?  Yes _____ No _____ N/A _____</p>	
(725.297a)	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes _____ No _____ N/A _____</p>	
(725.297b)	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298a)	<p>Are ignitable or reactive wastes placed in a tank system?  Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> <li>- the resulting waste, mixture or dissolved material is no longer ignitable or reactive?  Yes _____ No _____ N/A _____</li> <li>- Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</li> </ul> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies?  Yes _____ No _____ N/A _____</p>	
(725.298b)	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?  Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
725.299)	<p>Are incompatible wastes/materials placed in the same tank?  Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?  Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	N/A
(725.131)	<p><b>SUBPART C: PREPAREDNESS AND PREVENTION</b></p> <p>Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?  <i>OPEN SATURATE CONTAINERS</i> Yes _____ No <u>X</u> N/A _____</p>	
(725.132)	<p>Is the facility equipped with the following, if necessary:</p> <p>a) an internal communication or alarm system(s)?  Yes <u>X</u> No _____ N/A _____</p> <p>b) a telephone or other device to summon emergency assistance from local authorities?  Yes <u>X</u> No _____ N/A _____</p> <p>c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?  Yes <u>X</u> No _____ N/A _____</p> <p>d) water at adequate volume and pressure for fire control?  Yes <u>X</u> No _____ N/A _____</p>	
(725.133)	<p>Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment?  Yes <u>X</u> No _____ N/A _____</p>	
(725.134)	<p>a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device?  Yes _____ No <u>X</u> N/A _____</p> <p>b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance?  Yes _____ No _____ N/A <u>X</u></p>	
(725.135)	<p>Is the facility maintaining adequate aisle space?  Yes <u>X</u> No _____ N/A _____</p>	
(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> <li>arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes?  Yes <u>X</u> No _____ N/A _____</li> <li>agreements designating the primary authority where more than one police or fire department might respond? <i>FIRE DEPT. ALSO EMERGENCY RESPONSE TEAM</i>  Yes <u>X</u> No _____ N/A _____</li> <li>agreements with State emergency response teams, contractors and equipment suppliers?  Yes _____ No _____ N/A <u>X</u></li> <li>arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility?  Yes <u>X</u> No _____ N/A _____</li> </ul>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
51a)	Is the contingency plan available? Yes <u>X</u> No _____ N/A _____ If "No", skip to Section 725.155.	
	Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <u>X</u> No _____ N/A _____	
(725.151b)	Has there been a fire, explosion or release of hazardous waste? Yes _____ No <u>X</u> N/A _____ If "Yes", has the contingency plan been carried out immediately? Yes _____ No _____ N/A _____	
(725.152a)	Does the plan describe the actions required for response to: - fires? Yes <u>X</u> No _____ N/A _____ - explosions? Yes <u>X</u> No _____ N/A _____ - releases? Yes <u>X</u> No _____ N/A _____	
(725.152c)	Does the plan describe arrangements with: <i>JUST SAYING ARRANGEMENTS MADE</i> - police and fire departments? Yes _____ No _____ N/A _____ - hospitals? Yes _____ No _____ N/A _____ - contractors? Yes _____ No _____ N/A _____ - emergency response teams? Yes _____ No _____ N/A _____	
(725.152d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <u>X</u> No _____ N/A _____	
(725.152e)	Does the plan identify all emergency equipment including: - description? Yes <u>X</u> No _____ N/A _____ - capability? Yes <u>X</u> No _____ N/A _____ - location? Yes <u>X</u> No _____ N/A _____ Is the list of emergency equipment up-to-date? Yes <u>X</u> No _____ N/A _____	
(725.152f)	Does the plan include: - an evacuation plan? Yes <u>X</u> No _____ N/A _____ - an evacuation signal? Yes <u>X</u> No _____ N/A _____ - alternate evacuation routes? Yes <u>X</u> No _____ N/A _____	
(725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes <u>X</u> No _____ N/A _____ b) submitted to: - police department? Yes <u>X</u> No _____ N/A _____ - fire department? Yes <u>X</u> No _____ N/A _____ - hospital? Yes <u>X</u> No _____ N/A _____ - emergency response teams? Yes <u>X</u> No _____ N/A _____	
(725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes _____ No _____ N/A <u>X</u> b) the plan fails in an emergency? Yes _____ No _____ N/A <u>X</u> c) the facility changes in a way that modifies the emergency response necessary? Yes _____ No _____ N/A <u>X</u> d) information regarding emergency coordinators changes? Yes <u>X</u> No _____ N/A _____ e) information regarding equipment changes? Yes _____ No _____ N/A <u>X</u>	
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes <u>X</u> No _____ N/A _____ Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <u>X</u> No _____ N/A _____ Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <u>X</u> No _____ N/A _____	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>Note: If the facility has had a release, explain in detail.</p>	
(725.116a)	<p><b>Section 725.116 Personnel Training</b></p> <p>Does the facility have a training program?</p> <p>Yes <u>X</u> No _____ N/A _____</p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725?</p> <p>Yes <u>X</u> No _____ N/A _____</p> <p>Is the program directed by a person trained in hazardous waste management procedures?</p> <p>Yes <u>X</u> No _____ N/A _____</p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?</p> <p>Yes <u>X</u> No _____ N/A _____</p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems?</li> <li>Yes <u>X</u> No _____ N/A _____</li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment?</li> <li>Yes <u>X</u> No _____ N/A _____</li> <li>- key parameters for automatic waste feed cut-off systems?</li> <li>Yes _____ No _____ N/A <u>X</u></li> <li>- communications or alarm systems?</li> <li>Yes <u>X</u> No _____ N/A _____</li> <li>- response to fire or explosions?</li> <li>Yes <u>X</u> No _____ N/A _____</li> <li>- response to groundwater contamination incidents?</li> <li>Yes _____ No _____ N/A <u>X</u></li> <li>- shutdown of operations?</li> <li>Yes <u>X</u> No _____ N/A _____</li> </ul>	
(725.116b)	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste?</p> <p>Yes <u>X</u> No _____ N/A _____</p>	
(725.116c)	<p>Have facility personnel received an annual review of the initial training?</p> <p>Yes <u>X</u> No _____ N/A _____</p>	
(725.116d)	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job?</li> <li>Yes <u>X</u> No _____ N/A _____</li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position?</li> <li>Yes <u>X</u> No _____ N/A _____</li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management?</li> <li>Yes <u>X</u> No _____ N/A _____</li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel?</li> <li>Yes <u>X</u> No _____ N/A _____</li> </ol>	
(725.116e)	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment?</p> <p>Yes <u>X</u> No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
107a4)	<b>Section 728.107 Waste Analysis and Recordkeeping</b> Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <u>X</u> Is the plan on-site? Yes _____ No _____ N/A <u>X</u> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <u>X</u> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <u>X</u> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <u>X</u>	
722.134(c)	<b>Section 722.134 Satellite Accumulation</b> <i>SATURDAY CONTAINERS OPEN</i> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste 722.134(c) limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No <u>X</u> N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No _____ N/A <u>X</u> If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <u>X</u> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <u>X</u>	722.134(c)
722.140(a)	<b>SUBPART D: RECORDKEEPING AND REPORTING</b> <b>Section 722.140 Recordkeeping</b> Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <u>X</u> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <u>X</u> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? <i>UNKNOWN</i> Yes _____ No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <u>X</u>	722.140(d)
722.141(a)	<b>Section 722.141 Annual Reporting</b> Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <u>X</u> No _____ N/A _____ <b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <u>X</u> No _____ N/A _____	722.141(b)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
142(a)(1)	<b>Section 722.142 Exception Reporting</b> If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No _____ N/A <u>X</u>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes _____ No _____ N/A <u>X</u>	722.142(a)(2)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A <u>X</u>	722.143
	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b>  Is the generator an exporter of hazardous waste? Yes _____ No _____ N/A <u>X</u> If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A <u>X</u>	
	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b>  Is the generator an importer of hazardous waste? Yes _____ No _____ N/A <u>✓</u> If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A <u>✓</u>	
	<b>SUBPART G: FARMERS</b>  Is the generator a farmer? Yes _____ No _____ N/A <u>✓</u> If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A <u>✓</u>	
	COMMENTS:          	

TM:jab\722gen2.wpd

Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
	<b>PART 728: RCRA LAND DISPOSAL RESTRICTIONS</b>	
728.101	<b>Note:</b> This Part identifies 1) hazardous wastes that are restricted from land disposal and 2) those circumstances where otherwise prohibited wastes may continue to be land disposed. This Part applies to persons that generate or transport hazardous waste and to owners and operators of hazardous waste treatment, storage, and disposal facilities.	
728.101(c)	<b>Note:</b> Restricted wastes may continue to be land disposed as follows: 1) an extension has been granted to the effective date of a prohibition (728.105); 2) an exemption has been granted from a prohibition (728.106). 3) if the waste is hazardous only because it exhibits a characteristic, is treated by DEACT, or is a D003 reactive cyanide and meets any of the criteria below: i) the waste is managed in a treatment system that discharges to waters of the U.S. pursuant to a Part 309 permit (i.e. NPDES); ii) the waste is treated for purposes of the pretreatment requirements of Parts 307 and 310; or iii) the waste is managed in a zero discharge system engaged in CWA-equivalent treatment (728.137(a)); and iv) the waste no longer exhibits a characteristic at the point of land disposal.	
728.101(d)	<b>Note:</b> This Part does not affect the availability of a waiver under CERCLA Section 121(d)(4).	
728.101(e)	<b>Note:</b> The following hazardous wastes are not subject to any provision of this Part: 1) wastes generated by a CESQG (<100 Kg/month); 2) on-site disposal of waste pesticide by a farmer (722.170); 3) waste identified or listed as hazardous after 11/8/84 for which USEPA has not promulgated a land disposal prohibition or treatment standard; 4) de minimis losses of waste that exhibit a characteristic of hazardous waste to wastewaters; or 5) laboratory wastes mixed with other plant wastewaters as described in this subsection.	
728.101(f)	<b>Note:</b> Universal wastes are exempt from Sections 728.107 and 728.150.	
728.101(g)	<b>Note:</b> This Part is cumulative with the land disposal restrictions of Part 729.	
	<b>SUBPART A: GENERAL</b>	
	<b>Section 728.103 Dilution Prohibited as a Substitute for Treatment</b>	
	<b>Note:</b> A <input type="checkbox"/> Yes <input type="checkbox"/> answer to any of the questions under Section 728.103 is a violation.	
728.103(a)	Has a person diluted a restricted waste or a treatment residual of a restricted waste as a substitute for adequate treatment? Yes _____ No _____ N/A <u>X</u>	728.103(a)
728.103(b)	Has a person diluted a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (Part 309), that treats wastes in a CWA-equivalent treatment system, or that treats wastes for purposes of pretreatment requirements under Part 310, using a method other than DEACT or for D003 reactive cyanide wastewater or nonwastewater? Yes _____ No _____ N/A <u>X</u>	728.103(b)
728.103(c)	Is combustion of any of the wastes identified in Section 728.Appendix K occurring without meeting one or more of the criteria under this Section upon generation or after treatment? Yes _____ No _____ N/A <u>X</u>	728.103(c)
728.103(d)	Has a person added iron to lead-containing hazardous wastes in order to achieve LDR treatment standards for lead? Yes _____ No _____ N/A <u>X</u>	728.103(d)
94	<b>Section 728.104 Treatment Surface Impoundment Exemption</b> Are wastes that are otherwise prohibited from land disposal under this Part being treated in a surface impoundment that meets all of the conditions of this Section? Yes _____ No _____ N/A <u>X</u>	728.104

Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
(a)(1)	<b>Section 728.107 Waste Analysis and Recordkeeping</b> <i>KNOWLEDGE</i> Has the generator determined if the waste has to be treated before it can be land disposed? Yes _____ No _____ N/A _____	
728.107(a)(2)	<b>Note:</b> If the generator is managing a characteristic hazardous waste, then the generator shall comply with the special requirements of Section 728.109.  If a generator determines that its waste does not meet the treatment standards, has a one-time written notice been sent with the initial shipment to each treatment or storage facility (and placed a copy of the notice in the generator's file) that includes the following information (Section 728. Table I: Generator Paperwork Requirements):  1) USEPA hazardous waste manifest number of first shipment? Yes <u>X</u> No _____ N/A _____  2) The statement: <input type="checkbox"/> The waste is subject to the LDRs? Yes <u>X</u> No _____ N/A _____  <b>Note:</b> The constituents of concern for F001 through F005 and F039 and underlying hazardous constituents in characteristic wastes are required on the notice unless all constituents will be treated and monitored.  3) The applicable wastewater/nonwastewater category and subdivisions made within a waste code based on waste-specific criteria? Yes _____ No <u>X</u> N/A _____  4) Waste analysis data (when available)? <i>KNOWLEDGE</i> Yes _____ No _____ N/A <u>X</u>  5) When treating hazardous debris with alternative treatment technologies, the contaminants subject to treatment and an indication that these contaminants are being treated to comply with Section 728.145? Yes _____ No _____ N/A <u>X</u>  <b>Note:</b> No further notification is necessary until such time that the waste or facility changes.	728.107(a)(1)
728.107(a)(3)	Has the generator of a restricted waste or contaminated soil that meets the applicable treatment standards sent a one-time written notice with the required certification statement (and placed a copy in the generator's file) to each TSDF receiving the waste? Yes _____ No _____ N/A <u>X</u>	728.107(a)(2)
728.107(a)(3)	<b>Note:</b> The notice must include the information specified in Section 728. Table I: Generator Paperwork Requirements (column 728.107(a)(3)).	
728.107(a)(4)	Has the generator of an exempt hazardous waste or contaminated soil sent a one-time written notice per Section 728. Table I: Generator Paperwork Requirements (column 728.107(a)(4)) to each LDF receiving the waste? Yes _____ No _____ N/A <u>X</u>	728.107(a)(3)
728.107(a)(5)	Has the generator developed, followed, and filed on-site a written waste analysis plan in accordance with this subsection for managing and treating prohibited hazardous waste or contaminated soil in tanks, containers, or containment buildings regulated under Section 722.134? Yes _____ No _____ N/A <u>X</u>	728.107(a)(4)
728.107(a)(5)	<b>Note:</b> The notification requirements of subsection 728.107(a)(3) apply to wastes shipped off-site pursuant to this subsection 728.107(a)(5).	728.107(a)(5)
728.107(a)(6)	Has the generator retained on-site all supporting data used to make the determination, based on either knowledge of the waste or waste analysis data, that the hazardous waste or contaminated soil is restricted? Yes _____ No <u>X</u> N/A _____	728.107(a)(6)

Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
728.107(a)(7)	Has the generator managing prohibited waste that is excluded from the definition of hazardous or solid waste or which is exempt from Subtitle C regulation (Sections 721.102 through 721.106), prepared and kept on-site a one-time notice of these exclusions or exemptions and the disposition of the waste? Yes _____ No _____ N/A <u>X</u>	728.107(a)(7)
728.107(a)(8)	Has the generator retained all copies of notices, certifications, waste analysis data, and other documentation produced pursuant to this Section for at least three years from the date such waste was last sent to on-site or off-site treatment, storage, or disposal? Yes <u>X</u> No _____ N/A _____	728.107(a)(8)
728.107(a)(9)	Has the generator managing lab packs using alternative treatment standards fulfilled the conditions of this subsection including the notice specified in Section 728.107(a)(9)? Yes _____ No _____ N/A <u>X</u>	728.107(a)(9)
728.107(a)(10)	Has the small quantity generator (>100 - <1000 Kg/month) with a tolling agreement pursuant to Section 722.120(e) retained on-site a copy of the notice and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? Yes _____ No _____ N/A <u>X</u>	728.107(a)(10)
728.107(b)	Has the treatment facility tested its waste or contaminated soil according to the frequency specified in its waste analysis plan as required by Sections 724.113 or 725.113 and subsections (b)(1) and (b)(2) of this section? Yes _____ No _____ N/A <u>X</u>	728.107(b)
728.107(b)(3)	Has the treatment facility sent a one-time written notice with the initial shipment to the land disposal facility and kept a copy at the treatment facility that includes the required information indicated in the Treatment Facility Paperwork Requirements Table? Yes _____ No _____ N/A <u>X</u>	728.107(b)(3)
728.107(b)(4)	Has the treatment facility submitted a certification, as specified in subsection 728.107(b)(4), with the initial shipment of waste, contaminated soil, or treatment residue of a restricted waste to the land disposal facility and placed a copy in the treatment facility's on-site files? Yes _____ No _____ N/A <u>X</u>	728.107(b)(4)
728.107(b)(5)	<b>Note:</b> There are specific certification requirements for: B) debris excluded from the definition of hazardous waste; C) organic constituents having treatment standards expressed as concentration levels; D) characteristic waste treated on-site to remove the characteristic and then sent off-site for treatment of underlying hazardous waste constituents; and E) characteristic waste that contain underlying hazardous constituents that are treated on-site to remove the hazardous characteristics and to treat underlying hazardous constituents.  For waste or treatment residue that will be further managed at a different TSDF, is the treatment facility that sends the waste complying with the notification and certification requirements applicable to generators under Section 728.107(a)? Yes _____ No _____ N/A <u>X</u>	728.107(b)(5)
728.107(b)(6)	Has the recycling facility that is making off-site shipments of recyclable materials used in a manner constituting disposal: 1) submitted to the Agency a notice and certification with each shipment in accordance with 728.107(b)(3) and (b)(4)? Yes _____ No _____ N/A <u>X</u>  2) kept records of the name and location of each entity receiving the hazardous waste-derived product? Yes _____ No _____ N/A <u>X</u>	728.107(b)(6)
728.107(c)	Has owner or operator of any land disposal facility disposing any waste subject to restrictions under this Part: 1) maintained in its files copies of the notices and certifications specified in Sections 728.107(a) and (b)? Yes _____ No _____ N/A <u>X</u>  2) tested the waste or an extract of the waste or treatment residue according to the frequency specified in the facility's waste analysis plan (Section 724.113 or 725.113) to assure the waste or treatment residue meets the applicable treatment standards? Yes _____ No _____ N/A <u>X</u>	728.107(c)

Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
728.107(d)	<p><b>Note:</b> If an owner or operator is disposing of any waste that is a recyclable material used in a manner constituting disposal subject to the provisions of Section 726.120(b), they are not subject to subsections 728.107(c)(1) through (c)(3).</p> <p>Has the generator or treater who first claims that their hazardous debris is excluded from the definition of a hazardous waste under Section 721.103(e) provided the following notification and certification:</p> <p>1) a one-time notification submitted to the Agency including the following information:</p> <p>A) the name and address of the RCRA Subtitle D facility receiving the treated debris?   Yes _____ No _____ N/A <u>X</u></p> <p>B) a description of the hazardous debris as initially generated including the applicable USEPA hazardous waste code(s)?   Yes _____ No _____ N/A <u>X</u></p> <p>C) for debris excluded under Section 721.103(e)(1), the technology from Section 728.Table F used to treat the debris?   Yes _____ No _____ N/A <u>X</u></p> <p>2) Has the notification been updated if the debris is shipped to a different facility, and, for debris excluded under Section 721.102(e)(1) if a different type of debris is treated, or if a different technology is used to treat the debris?   Yes _____ No _____ N/A <u>X</u></p> <p>3) For debris excluded under Section 721.103(e)(1), has the owner or operator of the treatment facility documented and certified compliance with the treatment standards of Section 728.Table F pursuant to this subsection?   Yes _____ No _____ N/A <u>X</u></p>	728.107(d)
728.107(e)	<p>Has the generator or treater that first receives a determination from USEPA or the Agency that a given contaminated soil subject to LDRs (Section 728.149(a)) no longer contains a listed hazardous waste or exhibits a characteristic of hazardous waste:</p> <p>1) prepared a one-time only documentation of these determinations including all supporting information?   Yes _____ No _____ N/A <u>X</u></p> <p>2) maintained that information in the facility files and other records for a minimum of three years?   Yes _____ No _____ N/A <u>X</u></p>	728.107(e)
728.109(a)	<p><b>Section 728.109 Special Rules for Characteristic Wastes</b></p> <p>Has the initial generator of a solid waste determined each hazardous waste code applicable to the waste in order to determine the applicable treatment standards under Subpart D of Part 728?   Yes <u>X</u> No _____ N/A _____</p> <p><b>Note:</b> For purposes of this Part, the waste must carry the waste code for any applicable listing under Part 721, Subpart D and one or more of the waste codes under Part 721, Subpart C where the waste exhibits the relevant characteristic, except in the case when the treatment standard for the Subpart D waste code operates in lieu of the standard for the Subpart C waste code as specified in subsection (b).</p> <p>If the generator determines that its waste displays a characteristic of hazardous waste (and the waste is not D001 nonwastewaters treated by CMBST, RORGS, or POLYM of Section 728.Table C), has the generator determined the underlying hazardous constituents (as defined at Section 728.102) in the characteristic waste?   Yes <u>X</u> No _____ N/A _____</p>	728.109(a)
728.109(b)	<p>Does the waste meet the treatment standards for all applicable listed and characteristic waste codes?   Yes _____ No <u>X</u> N/A _____</p> <p><b>Note:</b> Where a prohibited waste is both listed and characteristic, the treatment standard for the listed waste code will operate in lieu of the standard for the characteristic waste code, provided that the treatment standard for the listed waste includes a treatment standard for the constituent that causes the waste to exhibit the characteristic.</p>	728.109(b)

Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
728.109(c)	Has the generator land disposed any prohibited waste that exhibits a characteristic under Part 721, Subpart C only if the waste complies with the treatment standards under Part 728, Subpart D (in addition to any applicable standards determined from the initial point of generation)? Yes _____ No _____ N/A <u>X</u>	728.109(c)
728.109(d)	Has the generator of a waste that no longer exhibits a characteristic placed a one-time notification and certification in the generator's or treater's files and sent a copy to the Agency (except for those facilities described in Section 728.109(f))? Yes _____ No _____ N/A <u>X</u>	728.109(d)
728.109(d)(1)	Has the notification and certification been updated to reflect process or operational changes in waste generation or RCRA Subtitle D receiving facility changes? Yes _____ No _____ N/A <u>X</u>	728.109(d)
728.109(d)(1)	Has the generator or treater notified the Agency annually (by December 31) of any such changes? Yes _____ No _____ N/A <u>X</u>	728.109(d)
728.109(d)(1)	Does the notification include: A) the name and address of the RCRA Subtitle D (municipal solid waste landfill) facility receiving the waste shipment; and B) a description of the waste as initially generated, including the applicable USEPA hazardous waste codes, the treatability group(s), and the underlying hazardous constituents (Section 728.102), unless the waste will be treated and monitored for all underlying hazardous constituents? Yes _____ No _____ N/A <u>X</u>	728.109(d)(1)
728.109(d)(2)	<b>Note:</b> If all underlying hazardous constituents will be treated and monitored, there is no requirement to list any of the underlying hazardous constituents on the notice. Is the certification signed by an authorized representative and does the certification state the language found in either: Section 728.107(b)(4)? or Yes _____ No _____ N/A <u>X</u>	728.109(d)(2)
728.109(d)(3)	If treatment removes the characteristics but does not meet standards applicable to underlying hazardous constituents, Section 728.107(b)(4)(D)? Yes _____ No _____ N/A <u>X</u>	728.109(d)(3)
728.109(d)(3)	For a characteristic waste whose ultimate disposal will be into a Class I injection well, has the generator complied with this subsection? Yes _____ No _____ N/A <u>X</u>	728.109(d)(3)
728.109(e)	For a decharacterized waste managed on-site in a wastewater treatment system subject to Clean Water Act (CWA) or zero-dischargers engaged in CWA-equivalent treatment, has the generator monitored compliance with the treatment standards (Sections 728.148 and 728.149 Table D) quarterly (unless the treatment is aggressive biological treatment, in which case compliance must be monitored annually)? Yes _____ No _____ N/A <u>X</u>	728.109(e)
728.109(f)	Are monitoring results kept in on-site files for at least 5 years? Yes _____ No _____ N/A <u>X</u>	728.109(f)
728.109(f)	For a decharacterized waste managed on-site in a wastewater treatment system subject to CWA for which all underlying hazardous constituents are addressed by a CWA permit, has the generator kept compliance documentation in on-site files? Yes _____ No _____ N/A <u>X</u>	728.109(f)
728.109(g)	For a characteristic waste whose ultimate disposal will be into a Class I injection well that qualifies for the de minimus exclusion described in Section 728.101, has the generator kept information supporting that qualification in on-site files? Yes _____ No _____ N/A <u>X</u>	728.109(g)



Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
	<b>SUBPART C: PROHIBITION OF LAND DISPOSAL</b>	
728.130	<b>Section 728.130 Waste Specific Prohibitions - Wood Preserving Wastes</b> Has the generator of wood preserving wastes, soil, debris, and radioactive wastes soil and debris (F032, F034, or F035) land disposed the wastes only after having: <ol style="list-style-type: none"> <li>met the treatability standards of Part 728, Subpart D; or</li> <li>been granted an exemption from prohibition pursuant to a petition under Section 728.106;</li> <li>met the applicable treatment standards established pursuant to a petition granted under Section 728.144; or</li> <li>been granted an extension to the effective date of prohibition pursuant to 40 CFR 268.5?</li> </ol> <p style="text-align: center;">Yes _____ No _____ N/A _____</p>	N/A
728.130(e)	Has the generator of wood preserving wastes tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? <p style="text-align: center;">Yes _____ No _____ N/A _____</p>	728.130
728.131	<b>Section 728.131 Waste Specific Prohibitions - Dioxin-Containing Wastes</b> Has the generator of a dioxin-containing waste, soil and debris (F020, F021, F022, F023, F026, F027 or F028) land disposed the waste only after having: <ol style="list-style-type: none"> <li>met the treatability standards of Part 728, Subpart D; or</li> <li>been granted an exemption from prohibition pursuant to a petition under Section 728.106; or</li> <li>been granted an extension to the effective date of prohibition pursuant to Section 728.105?</li> </ol> <p style="text-align: center;">Yes _____ No _____ N/A _____</p>	728.130(e)
	<b>Section 728.134 Waste Specific Prohibitions - Toxicity Characteristic Metal Waste</b> <b>Note:</b> Toxicity Characteristic metal waste include, waste soils or debris carrying the D004 through D011 codes and slag from secondary lead smelters. Effective May 26, 2000 Toxicity Characteristic metal waste will include waste from elemental phosphorus processing and radioactive waste mixed with D004 - D011.	728.131
728.134	Has the generator of toxicity characteristic metal waste, soil and debris land disposed the waste only after having: <ol style="list-style-type: none"> <li>met the treatability standards of Part 728, Subpart D; or</li> <li>been granted an exemption from prohibition pursuant to a petition under Section 728.106;</li> <li>met the applicable treatment standards established pursuant to a petition granted under Section 728.144; or</li> <li>been granted an extension to the effective date of prohibition pursuant to Section 40 CFR 268.5?</li> </ol> <p style="text-align: center;">Yes _____ No _____ N/A _____</p>	728.134
728.134(f)	Has the generator of toxicity characteristic metal waste tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? <p style="text-align: center;">Yes _____ No _____ N/A _____</p>	728.134
728.135	<b>Section 728.135 Waste Specific Prohibitions - Petroleum Refining Wastes</b> Has the generator of petroleum refining wastes soil, debris, and radioactive wastes soil and debris (K169, K170, K171, and K172) land disposed of the waste only after having: <ol style="list-style-type: none"> <li>met the treatability standards of Part 728, Subpart D; or</li> <li>been granted an exemption from prohibition pursuant to a petition under Section 728.106;</li> <li>met the applicable treatment standards established pursuant to a petition granted under Section 728.144;</li> <li>met the treatment standard in Section 728.140 and Table T for hazardous debris, or in the alternative, treatment standards in Section 728.145; or</li> <li>been granted an extension to the effective date of prohibition pursuant to 40 CFR 268.5?</li> </ol> <p style="text-align: center;">Yes _____ No _____ N/A _____</p>	728.134(f)
(c)	Has the generator of petroleum refining wastes tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? <p style="text-align: center;">Yes _____ No _____ N/A _____</p>	728.135
		728.135(c)

Regulation	RCRA LAND DISPOSAL RESTRICTIONS (PART 728)	Violation
(a)	<b>Section 728.137 Waste Specific Prohibitions - Ignitable and Corrosive Characteristic Wastes Whose Treatment Standards Were Vacated</b> Has the generator of D001 (not in the High TOC Ignitable Liquids Subcategory) or D002 waste refrained from land disposal of these wastes in means other than Clean Water Act regulated discharges, Class I deep well injection or zero dischargers that engage in CWA-equivalent treatment before ultimate land disposal Yes _____ No _____ N/A _____	N/A 728.137(a)
728.137(b)	Has the generator refrained from land disposal of any D001 (not in the High TOC Ignitable Liquid Subcategory) or D002 wastes managed in Class V injection wells that do not engage in CWA-equivalent treatment before injection? Yes _____ No _____ N/A _____	728.137(b)
728.138(a)	<b>Section 728.138 Waste Specific Prohibitions - Newly Identified Organic Toxicity Characteristic Wastes and Newly-Listed Coke By-Product and Chlorotoluene Production Wastes</b> Has the owner or operator land disposed any of the following wastes: <ul style="list-style-type: none"> <li>- K141, K142, K143, K144, K145, K147, K148, K149, K150 or K151;</li> <li>- Debris contaminated with F037, F038, K107 through K112, K117, K118, K123 through K126, K131, K132, K136, U328, U353, U359;</li> <li>- Soil and debris contaminated with D012 through D043, K141 through K145, or K147 through K151; or</li> <li>- D012 through D043 that are not radioactive, that are managed in systems other than those whose discharge is regulated under the CWA, that are zero dischargers that do not engage in CWA-equivalent treatment before ultimate disposal, or that are injected in Class I DEEP wells only after having: <ul style="list-style-type: none"> <li>1) met the treatability standards of Part 728, Subpart D; or</li> <li>2) been granted an exemption from prohibition pursuant to a petition under Section 728.106;</li> <li>3) met the applicable treatment standards established pursuant to a petition granted under Section 728.144; or</li> <li>4) been granted an extension to the effective date of prohibition pursuant to 40 CFR 268.5?</li> </ul> </li> </ul> Yes _____ No _____ N/A _____	728.138(a)
728.138(e)	Has the generator of the above wastes tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes _____ No _____ N/A _____	728.138(e)
728.139	<b>Section 728.139 Waste Specific Prohibitions - End-of-Pipe CWA, CWA-Equivalent, and Class I Nonhazardous Waste Injection Well Treatment Standards; Spent Aluminum Potliners; and Carbamate Wastes.</b> Has the owner or operator land disposed any of the following wastes: <ul style="list-style-type: none"> <li>1) Hazardous soil and debris with the hazardous waste numbers K156 through K159, K161, P127, P128, P185, P188 through P192, P194, P196 through P199, P201 through P205, U271, U278 through U280, U364, U367, U372, U373, U387, U389, U394, U395, U404, and U409 through U411;</li> <li>2) D003 other than those that are managed in a system whose discharge is regulated under Subtitle C, one that injects hazardous waste in a Class I injection well, or one that is a zero discharger that engages in federal CWA-equivalent treatment before ultimate land disposal;</li> <li>3) Waste, soil and debris with the hazardous waste number K088; and</li> <li>4) Radioactive waste, soil and debris with the hazardous waste numbers K088, K156 through K159, K161, P127, P128, P185, P188 through P192, P194, P196 through P199, P201 through P205, U271, U278 through U280, U364, U367, U372, U373, U387, U389, U394, U395, U404, and U409 through U411 only after having: <ul style="list-style-type: none"> <li>1) met the treatability standards of Part 728, Subpart D; or</li> <li>2) been granted an exemption from prohibition pursuant to a petition under Section 728.106;</li> <li>3) met the applicable treatment standards established pursuant to a petition granted under Section 728.144; or</li> <li>4) been granted an extension to the effective date of prohibition pursuant to 40 CFR 268.5?</li> </ul> </li> </ul> Yes _____ No _____ N/A _____	728.139
9(g)	Has the generator of the above wastes tested the waste or used knowledge of the waste to determine whether it exceeds the applicable treatment standards? Yes _____ No _____ N/A _____	728.139(g)

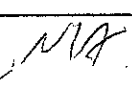


Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
	<b>PART 733: STANDARDS FOR UNIVERSAL WASTE MANAGEMENT</b>	
	<b>SUBPART A: GENERAL</b> <i>BANDS STATED AT 345 STWART</i>	
733.101	<b>Section 733.101 Scope</b> <b>Note:</b> This Part provides an alternative set of management standards for batteries (Section 733.102), pesticides (Section 733.103), thermostats (Section 733.104), and lamps (Section 733.105), in lieu of regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.  <b>Note:</b> Pursuant to Section 733.105, persons managing household hazardous wastes, exempt under subsection 724.104(b)(1), or conditionally exempt small quantity generator wastes, exempt under Section 721.105(g), and are of the same type as universal wastes defined in Section 733.106, may, at their option, manage them under the requirements of this Part.	
733.102	<b>Section 733.102 Applicability -- Batteries</b> <b>Note:</b> Spent lead-acid batteries that are managed under Part 726, Subpart G, are not covered under this Part. Generators of batteries as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part.	
733.103	<b>Section 733.103 Applicability -- Pesticides</b> <b>Note:</b> Pesticides covered under this Part include: <ol style="list-style-type: none"> <li>1) recalled stocks of a suspended and canceled pesticide as part of a voluntary or mandatory recall under Section 19(b) of FIFRA; or</li> <li>2) recalled stocks of a suspended and canceled pesticide as part of a voluntary recall by the registrant for a pesticide not in compliance with FIFRA; or</li> <li>3) stocks of other unused pesticide products that are collected and managed as part of a waste pesticide collection program.</li> </ol> <p>Pesticides not covered under this Part include recalled or unused pesticides that are managed by farmers in compliance with Section 722.170.</p>	
733.104	<b>Section 733.104 Applicability -- Mercury Thermostats</b> <b>Note:</b> Generators of mercury thermostats as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part.	
733.105	<b>Section 733.105 Applicability -- Lamps</b> <b>Note:</b> Generators of lamps as described in Section 733.109 that are characteristically hazardous, may, at their option, manage them under the requirements of this Part.	
	<b>SUBPART B: STANDARDS FOR SMALL QUANTITY GENERATORS</b>	
733.111(a)	<b>Section 733.111 Prohibitions</b> Has the small quantity handler refrained from disposing of universal waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.111(a)
733.111(b)	Has the small quantity handler refrained from diluting or treating universal waste, except by responding to releases (Section 733.117) or managing specific wastes (Section 733.113)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.111(b)
733.112	<b>Section 733.112 Notification</b> <b>Note:</b> A small quantity handler of universal waste means a universal waste handler that does not accumulate 5,000 kilograms or more of universal waste at any time. A small quantity handler of universal waste is not required to notify the Agency of its universal waste handling activities.	
733.113(a)(1)	<b>Section 733.113 Waste Management</b> Has the small quantity handler contained any universal waste battery that shows evidence of leakage, spillage, or damage in a proper container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.113(a)(1)
733.113(a)(2)	Has each battery cell remained intact and closed while the small quantity handler conducted the activities listed in subsection 733.113(a)(2) (except to remove electrolyte; but must be immediately closed after removal)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	733.113(a)(2)

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
73.113(a)(3)	Has the small quantity handler that removes electrolyte from batteries or that generates other solid waste as a result of the activities listed in subsection 733.113(a)(2) made a proper hazardous waste determination? Yes _____ No _____ N/A _____	
	<b>Note:</b> If the electrolyte or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.	733.113(a)(3)
733.113(b)	Has the universal waste pesticide(s) been contained in a closed container, an over packed container, a tank meeting the requirements of Part 725, Subpart J (except for 725.297(c) and 725.300), or a transport vehicle or vessel in a way that prevents releases to the environment? Yes _____ No _____ N/A _____	733.113(b)
733.113(c)(1)	Has the small quantity handler contained any universal waste mercury thermostat that shows evidence of leakage, spillage, or damage in a proper container? Yes _____ No _____ N/A _____	733.113(c)(1)
733.113(c)(2)	Has the small quantity handler followed each of the procedures identified in subsection 733.113(c)(2) when removing mercury-containing ampules from universal waste thermostats? Yes _____ No _____ N/A _____	733.113(c)(2)
733.113(c)(3)	Has the small quantity handler that removes mercury-containing ampules from universal waste thermostats or that generates other solid waste as a result of the removal of the ampules made a proper hazardous waste determination for mercury or clean-up residues resulting from spills or leaks or other solid waste generated? Yes _____ No _____ N/A _____	733.113(c)(3)
	<b>Note:</b> If the mercury, residues, or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.	
733.113(d)	Has the small quantity handler of lamps managed them in a manner that prevents releases to the environment as follows:	
733.113(d)(1)	Contained all lamps in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps, and kept such containers and packages closed with no evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions? <i>OPEN</i> Yes _____ No <input checked="" type="checkbox"/> N/A _____	733.113(d)(1)
733.113(d)(2)	Immediately cleaned up and contained any lamp that is broken and placed in a container any lamp that shows evidence of breakage, leakage, or damage that could cause a release of hazardous constituents. Yes _____ No _____ N/A <input checked="" type="checkbox"/>	733.113(d)(2)
733.113(d)(3)	treated (by crushing) those lamps only under the following conditions:  A) in a closed system where emission of mercury does not exceed 0.1mg/m <sup>3</sup> on the basis of time weighted average over an 8-hour period? Yes _____ No _____ N/A _____  B) submitted Agency notification of crushing activity quarterly? Yes _____ No _____ N/A _____  C) immediately transferred any material recovered from a spill or leak to a proper container and have available equipment necessary to recover such material? Yes _____ No _____ N/A _____  D) ensures that the crushing area is well ventilated and monitored to comply with OSHA mercury levels? Yes _____ No _____ N/A _____  E) ensures that employees crushing lamps are familiar with handling and emergency procedures for mercury waste? Yes _____ No _____ N/A _____  F) crushed lamps are stored in closed non-leaking containers that are in good condition? Yes _____ No _____ N/A _____	733.113(d)(3)

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
7 (a)	<b>Section 733.114 Labeling and Marking</b> Does the small quantity handler of universal waste batteries label or mark each battery or container of batteries with one of the following: "Universal Waste-Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)"? Yes _____ No _____ N/A _____	733.114(a)
733.114(b)	Does the small quantity handler of <u>recalled</u> universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the label that was on or accompanied the product and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes _____ No _____ N/A _____	733.114(b)
733.114(c)	Does the small quantity handler of <u>unused</u> universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the original product label (if still legible) or, if not legible, the appropriate USDOT label or, if not feasible, another label prescribed or designated by the collection program; and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes _____ No _____ N/A _____	733.114(c)
733.114(d)	Does the small quantity handler of universal waste thermostats label or mark each thermostat or container of thermostats with one of the following: "Universal Waste-Mercury Thermostat(s)", "Waste Mercury Thermostat(s)", or "Used Mercury Thermostat(s)"? Yes _____ No <u>401c 10/14/02</u> N/A _____	733.114(d)
733.114(e)	Does the small quantity handler of universal waste lamps label or mark each lamp or container of lamps with one of the following: "Universal Waste-lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)"? Yes _____ No <u>X</u> N/A _____	733.114(e)
733.115(a)	<b>Section 733.115 Accumulation Time Limits</b> Does a small quantity handler of universal waste accumulate the waste for no longer than one year from the date it was generated or received unless the requirements of subsection 733.115(b) are met? <u>21 YR</u> Yes <u>X</u> No _____ N/A _____	733.115(a)
733.115(b)	A small quantity handler of universal waste may accumulate universal waste for longer than one year from the date of generation or receipt if such activity is done solely to facilitate proper recovery, treatment, or disposal. The handler bears the burden of proof for such activity. Yes _____ No _____ N/A <u>X</u>	733.115(b)
733.115(c)	Does the small quantity handler of universal waste demonstrate the length of accumulation time from the date it becomes a waste or is received in accordance with this subsection? Yes _____ No _____ N/A <u>X</u>	733.115(c)
733.116	<b>Section 733.116 Employee Training</b> Has the small quantity handler of universal waste informed all employees handling or managing universal waste of proper and appropriate handling and emergency procedures? Yes <u>X</u> No _____ N/A _____	733.116
733.117(a)	<b>Section 733.117 Response to Releases</b> Has the small quantity handler of universal waste immediately contained all releases and residues? Yes _____ No _____ N/A <u>X</u>	733.117(a)
733.117(b)	Has the small quantity handler of universal waste made a hazardous waste determination of material resulting from a release and, if so, managed the hazardous waste in accordance with all applicable requirements of 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728? Yes _____ No _____ N/A <u>X</u>	733.117(b)
733.118(a)	<b>Section 733.118 Off-Site Shipments</b> Does the small quantity handler of universal waste only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? Yes <u>X</u> No _____ N/A _____	733.118(a)
7 8(b)	If a small quantity handler of universal waste self-transportes universal waste off-site, is it done so only in compliance with the transporter requirements of Subpart D (Part 733)? Yes _____ No _____ N/A _____	733.118(b)

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
73. (c)	Has the small quantity universal waste handler only offered universal waste (that is a USDOT hazardous material under 49 CFR 171 through 180) for off-site transportation in accordance with applicable USDOT regulations (49 CFR 172 through 180)? Yes <u>X</u> No _____ N/A _____	733.118(c)
733.118(d)	Does the originating small quantity universal waste handler ensure, prior to shipment, that the receiving handler agrees to receive the shipment? Yes <u>X</u> No _____ N/A _____	733.118(d)
733.118(e)	Does the small quantity handler of universal waste whose shipment of universal waste is rejected by the receiving handler or destination facility either received the waste back or agreed on an alternate destination facility to which the shipment will be sent? Yes _____ No _____ N/A <u>X</u>	733.118(e)
733.118(f)	If the small quantity handler of universal waste has rejected a shipment of universal waste from another handler, have they notified the originating handler of the rejection and either sent the shipment back to the originating handler or sent the shipment to an agreed upon destination facility? Yes _____ No _____ N/A <u>X</u>	733.118(f)
733.118(g)	If the small quantity handler of universal waste has received a shipment containing hazardous waste that is not a universal waste, have they immediately notified the Agency of the shipment and sought instruction from the Agency for managing the hazardous waste? Yes _____ No _____ N/A <u>X</u>	733.118(g)
733.118(h)	If the small quantity handler of universal waste receives a shipment of non-hazardous, non-universal waste, has the handler managed the waste in compliance with applicable solid waste regulation? Yes _____ No _____ N/A <u>X</u>	733.118(h)
733.119	<b>Section 733.119 Tracking Universal Waste Shipments</b> <b>Note:</b> A small quantity handler of universal waste is not required to keep records of shipments of universal waste.	
733.120	<b>Section 733.120 Exports</b> Has the small quantity handler of universal waste complied with this section for all exports of universal waste? Yes _____ No _____ N/A <u>X</u>	733.120
	<b>SUBPART C: STANDARDS FOR LARGE QUANTITY HANDLERS</b>	
733.131(a)	<b>Section 733.131 Prohibitions</b> Has the large quantity handler refrained from disposing of universal waste? Yes _____ No _____ N/A _____	733.131(a)
733.131(b)	Has the large quantity handler refrained from diluting or treating universal waste, except by responding to releases (Section 733.137) or managing specific wastes (Section 733.133)? Yes _____ No _____ N/A _____	733.131(b)
733.132(a)	<b>Section 733.132 Notification</b> Has the large quantity handler of universal waste sent a written notification of universal waste management to the Agency and received a USEPA Identification Number before meeting or exceeding the 5000 kilogram storage limit? Yes _____ No _____ N/A _____	733.132(a)
	<b>Note:</b> A large quantity handler that has already notified the USEPA or Agency of its hazardous waste management activities and received a USEPA Identification Number is not required to renotify.	
	<b>Note:</b> A large quantity handler of recalled universal waste pesticides that has sent notification to USEPA or the Agency, as required by 40 CFR 165, is not required to renotify.	
b)	Does the notification submitted by the large quantity handler of universal waste include the information listed under subsections 733.132(b)(1) through (b)(5)? Yes _____ No _____ N/A _____	733.132(b)

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
733.133(a)(1)	<b>Section 733.133 Waste Management</b> Has the large quantity handler contained any universal waste battery that shows evidence of leakage, spillage, or damage in a proper container? Yes _____ No _____ N/A _____	 733.133(a)(1)
733.133(a)(2)	Has each battery cell remained intact and closed while the large quantity handler conducted the activities listed in subsection 733.133(a)(2) (except to remove electrolyte; but must be immediately closed after removal)? Yes _____ No _____ N/A _____	733.133(a)(2)
733.133(a)(3)	Has the large quantity handler that removes electrolyte from batteries or that generates other solid waste as a result of the activities listed in subsection 733.133(a)(2) made a proper hazardous waste determination? Yes _____ No _____ N/A _____  <b>Note:</b> If the electrolyte or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.	733.133(a)(3)
733.133(b)	Has the universal waste pesticide(s) been contained in a closed container, an over packed container, a tank meeting the requirements of Part 725, Subpart J (except for 725.297(c), 725.300, and 725.301) or a transport vehicle or vessel in a way that prevents releases to the environment? Yes _____ No _____ N/A _____	733.133(b)
733.133(c)(1)	Has the large quantity handler contained any universal waste mercury thermostat that shows evidence of leakage, spillage, or damage in a proper container? Yes _____ No _____ N/A _____	733.133(c)(1)
733.133(c)(2)	Has the large quantity handler followed each of the procedures identified in subsection 733.133(c)(2) when removing mercury-containing ampules from universal waste thermostats? Yes _____ No _____ N/A _____	733.133(c)(2)
733.133(c)(3)	Has the large quantity handler that removes mercury-containing ampules from universal waste thermostats or that generates other solid waste as a result of the removal of the ampules made a proper hazardous waste determination for mercury or clean-up residues resulting from spills or leaks or other solid waste generated? Yes _____ No _____ N/A _____  <b>Note:</b> If the mercury, residues, or other solid waste is a characteristic hazardous waste, it is subject to full regulation under 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728.	733.133(c)(3)
733.133(d)	Has the large quantity handler of lamps managed them in a manner that prevents releases to the environment as follows:	
733.133(d)(1)	Contained all lamps in containers or packages that are structurally sound, adequate to prevent breakage and compatible with the contents of the lamps, and kept such containers and packages closed with no evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions? Yes _____ No _____ N/A _____	733.133(d)(1)
733.133(d)(2)	Immediately cleaned up and contained any lamp that is broken and placed in a container any lamp that shows evidence of breakage, leakage, or damage that could cause a release of hazardous constituents. Yes _____ No _____ N/A _____	733.133(d)(2)
733.133(d)(3)	treated (by crushing) those lamps only under the following conditions:  A) in a closed system where emission of mercury does not exceed 0.1mg/m <sup>3</sup> on the basis of time weighted average over an 8-hour period? Yes _____ No _____ N/A _____  B) submitted Agency notification of crushing activity quarterly? Yes _____ No _____ N/A _____  C) immediately transferred any material recovered from a spill or leak to a proper container and have available equipment necessary to recover such material? Yes _____ No _____ N/A _____	733.133(d)(3)



Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
	<p>D) ensures that the crushing area is well ventilated and monitored to comply with OSHA mercury levels? Yes _____ No _____ N/A _____</p> <p>E) ensures that employees crushing lamps are familiar with handling and emergency procedures for mercury waste? Yes _____ No _____ N/A _____</p> <p>F) crushed lamps are stored in closed non-leaking containers that are in good condition? Yes _____ No _____ N/A _____</p>	<i>N/A</i>
733.134(a)	<p><b>Section 733.134 Labeling and Marking</b> Does the large quantity handler of universal waste batteries label or mark each battery or container of batteries with one of the following: "Universal Waste-Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)"? Yes _____ No _____ N/A _____</p>	733.134(a)
733.134(b)	<p>Does the large quantity handler of <u>recalled</u> universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the label that was on or accompanied the product and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes _____ No _____ N/A _____</p>	733.134(b)
733.134(c)	<p>Does the large quantity handler of <u>unused</u> universal waste pesticides label or mark each container/package, tank, vehicle, or vessel with the original product label (if still legible) or, if not legible, the appropriate USDOT label or, if not feasible, another label prescribed or designated by the collection program; and the words "Universal Waste-Pesticide(s)" or "Waste-Pesticide(s)"? Yes _____ No _____ N/A _____</p>	733.134(c)
733.134(d)	<p>Does the large quantity handler of universal waste thermostats label or mark each thermostat or container of thermostats with one of the following: "Universal Waste-Mercury Thermostat(s)", "Waste Mercury Thermostat(s)", or "Used Mercury Thermostat(s)"? Yes _____ No _____ N/A _____</p>	733.134(d)
733.134(e)	<p>Does the large quantity handler of universal waste mercury containing lamps label or mark each lamp or container of lamps with one of the following: "Universal Waste-lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)"? Yes: _____ No: _____ N/A: _____</p>	733.134(e)
733.135(a)	<p><b>Section 733.135 Accumulation Time Limits</b> Does a large quantity handler of universal waste accumulate the waste for no longer than one year from the date it was generated or received unless the requirements of subsection 733.135(b) are met? Yes _____ No _____ N/A _____</p>	733.135(a)
733.135(b)	<p>A large quantity handler of universal waste may accumulate universal waste for longer than one year from the date of generation or receipt if such activity is done solely to facilitate proper recovery, treatment, or disposal. The handler bears the burden of proof for such activity. Yes _____ No _____ N/A _____</p>	733.135(b)
733.135(c)	<p>Does the large quantity handler of universal waste demonstrate the length of accumulation time from the date it becomes a waste or is received in accordance with this subsection? Yes _____ No _____ N/A _____</p>	733.135(c)
733.136	<p><b>Section 733.136 Employee Training</b> Has the large quantity handler of universal waste ensured that all employees (relative to their responsibilities) are thoroughly familiar with proper universal waste handling and emergency procedures? Yes _____ No _____ N/A _____</p>	733.136
733.137(a)	<p><b>Section 733.137 Response to Releases</b> Has the large quantity handler of universal waste immediately contained all releases and residues? Yes _____ No _____ N/A _____</p>	733.137(a)
(b)	<p>Has the large quantity handler of universal waste made a hazardous waste determination of material resulting from a release and, if so, managed the hazardous waste in accordance with all applicable requirements of 35 Ill. Adm. Code 702 through 705, 720 through 726, and 728? Yes _____ No _____ N/A _____</p>	733.137(b)

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
733.138(a)	<b>Section 733.138 Off-Site Shipments</b> Does the large quantity handler of universal waste only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? Yes _____ No _____ N/A _____	733.138(a)
733.138(b)	If a large quantity handler of universal waste self-transport universal waste off-site, is it done so only in compliance with the transporter requirements of Subpart D (Part 733)? Yes _____ No _____ N/A _____	733.138(b)
733.138(c)	Has the large quantity universal waste handler only offered universal waste (that is a USDOT hazardous material under 49 CFR 171 through 180) for off-site transportation in accordance with applicable USDOT regulations (49 CFR 172 through 180)? Yes _____ No _____ N/A _____	733.138(c)
733.138(d)	Does the originating large quantity universal waste handler ensure, prior to shipment, that the receiving handler agrees to receive the shipment? Yes _____ No _____ N/A _____	733.138(d)
733.138(e)	Does the large quantity handler of universal waste whose shipment of universal waste is rejected by the receiving handler or destination facility either received the waste back or agreed on an alternate destination facility to which the shipment will be sent? Yes _____ No _____ N/A _____	733.138(e)
733.138(f)	If the large quantity handler of universal waste has rejected a shipment of universal waste from another handler, have they notified the originating handler of the rejection and either sent the shipment back to the originating handler or sent the shipment to an agreed upon destination facility? Yes _____ No _____ N/A _____	733.138(f)
733.138(g)	If the large quantity handler of universal waste has received a shipment containing hazardous waste that is not a universal waste, have they immediately notified the Agency of the shipment and sought instruction from the Agency for managing the hazardous waste? Yes _____ No _____ N/A _____	733.138(g)
733.138(h)	If the large quantity handler of universal waste receives a shipment of non-hazardous, non-universal waste, has the handler managed the waste in compliance with applicable solid waste regulation? Yes _____ No _____ N/A _____	733.138(h)
733.139(a)	<b>Section 733.139 Tracking Universal Waste Shipments</b> Does the large quantity handler keep a record of each universal waste shipment received at the facility that includes the originating universal waste handler's name and address, the quantity of each type of universal waste received, and the date of receipt of the universal waste? Yes _____ No _____ N/A _____	733.139(a)
733.139(b)	Does the large quantity handler keep a record of each shipment of universal waste sent from the handler to other facilities that includes the originating universal waste handler's name and address, the quantity of each type of universal waste received, and the date of receipt of the universal waste? Yes _____ No _____ N/A _____  <b>Note:</b> The record may take the form of a log, invoice, manifest, bill of lading, or other shipping document.	733.139(b)
733.139(c)(1)	Has the large quantity handler retained the required records for at least three years from the date of receipt of each shipment of universal waste? Yes _____ No _____ N/A _____	733.139(c)(1)
733.139(c)(2)	Has the large quantity handler retained the required records for at least three years from the date each shipment of universal waste left the facility? Yes _____ No _____ N/A _____	733.139(c)(2)
733.140	<b>Section 733.140 Exports</b> Has the large quantity handler of universal waste complied with this section for all exports of universal waste? Yes _____ No _____ N/A _____	733.140

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
	<b>SUBPART D: STANDARDS FOR UNIVERSAL WASTE TRANSPORTERS</b>	
(a)(1)	<b>Section 733.151 Prohibitions</b> Has the universal waste transporter refrained from disposing of universal waste? Yes _____ No _____ N/A _____	733.151(a)(1)
733.151(a)(2)	Has the universal waste transporter refrained from diluting or treating universal waste, except by responding to releases (Section 733.154) or as provided in subsection 733.151(b)? Yes _____ No _____ N/A _____	733.151(a)(2)
733.151(b)	Has the transporter of universal waste mercury containing lamps treated (by crushing) the lamps only under the following conditions:	733.151(b)
733.151(b)(1)	in a closed system where emission of mercury does not exceed 0.1mg/m <sup>3</sup> on the basis of time weighted average over an 8-hour period? Yes _____ No _____ N/A _____	
733.151(b)(2)	submitted Agency notification of crushing activity quarterly? Yes _____ No _____ N/A _____	
733.151(b)(3)	immediately transferred any material recovered from a spill or leak to a proper container and have available equipment necessary to recover such material? Yes _____ No _____ N/A _____	
733.151(b)(4)	ensures that the crushing area is well ventilated and monitored to comply with OSHA mercury levels? Yes _____ No _____ N/A _____	
733.151(b)(5)	ensures that employees crushing lamps are familiar with handling and emergency procedures for mercury waste? Yes _____ No _____ N/A _____	
733.151(b)(6)	crushed lamps are stored in closed non-leaking containers that are in good condition? Yes _____ No _____ N/A _____	
733.152	<b>Section 733.152 Waste Management</b> Has the universal waste transporter complied with all applicable USDOT regulations in 49 CFR 171 through 180 for transport of any universal waste that meets the definition of hazardous material in 49 CFR 171.8? Yes _____ No _____ N/A _____	733.152
733.153(a)	<b>Section 733.153 Accumulation Time Limits</b> Has the universal waste transporter only stored universal waste at a universal waste transfer facility for ten days or less? Yes _____ No _____ N/A _____	733.153(a)
	<b>Note:</b> If a universal waste transporter stores universal waste for more than ten days, the transporter becomes a universal waste handler and shall comply with Subparts B or C while sorting the universal waste.	
733.154(a)	<b>Section 733.154 Response to Releases</b> Has the universal waste transporter immediately contained all releases and residues? Yes _____ No _____ N/A _____	733.154(a)
733.154(b)	Has the universal waste transporter made a hazardous waste determination of material resulting from a release and, if so, managed the hazardous waste in accordance with all applicable requirements of 35 Ill. Adm. Code Parts 702 through 705, 720 through 726, and 728? Yes _____ No _____ N/A _____	733.154(b)
	<b>Note:</b> If the waste is determined to be a hazardous waste, the transporter is subject to 35 Ill. Adm. Code Part 722.	

Regulation	RCRA UNIVERSAL WASTE INSPECTION CHECKLIST (PART 733)	Violation
733.155(a)	<b>Section 733.155 Off-Site Shipments</b> Does the universal waste transporter only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? Yes _____ No _____ N/A _____	<i>N/A</i> 733.155(a)
733.155(b)	If the universal waste transporter ships off-site hazardous material as defined under 49 CFR 171.8, has the shipment been properly described on the shipping paper in accordance with 49 CFR Part 172 (USDOT regulations)? Yes _____ No _____ N/A _____	733.155(b)
733.156	<b>Section 733.156 Exports</b> Has the universal waste transporter complied with this section for all exports of universal waste? Yes _____ No _____ N/A _____	733.156
<b>SUBPART E: STANDARDS FOR DESTINATION FACILITIES</b>		
733.160	<b>Section 733.160 Applicability</b> <b>Note:</b> The owner or operator of a destination facility is subject to all applicable requirements of Parts 702 through 705, 720 through 726, and 728, and the notification requirement under Section 3010 of RCRA. However, a destination facility that recycles a universal waste without storing that waste before it is recycled shall comply with Section 721.106(c)(2).	
733.161(a)	<b>Section 733.161 Off-Site Shipments</b> Does destination facility only send or take universal waste to another universal waste handler, a destination facility, or a foreign destination? Yes _____ No _____ N/A _____	733.161(a)
733.161(b)	If the destination facility has rejected a shipment of universal waste from another handler, have they notified the originating handler of the rejection and either sent the shipment back to the originating handler or sent the shipment to an agreed upon destination facility? Yes _____ No _____ N/A _____	733.161(b)
733.161(c)	If the destination facility has received a shipment containing hazardous waste that is not a universal waste, have they immediately notified the Agency of the shipment and sought instruction from the Agency for managing the hazardous waste? Yes _____ No _____ N/A _____	733.161(c)
733.161(d)	If the destination facility receives a shipment of non-hazardous, non-universal waste, has the facility managed the waste in compliance with applicable solid waste regulation? Yes _____ No _____ N/A _____	733.161(d)
733.162(a)	<b>Section 733.162 Tracking Universal Waste Shipments</b> Does the destination facility keep a record of each universal waste shipment received at the facility that includes the originating universal waste handler's name and address, the quantity of each type of universal waste received, and the date of receipt of the universal waste? Yes _____ No _____ N/A _____	733.162(a)
733.162(b)	Does the destination facility retain the records described in subsection (a) above for at least three years from the date of receipt of each shipment? Yes _____ No _____ N/A _____	733.162(b)
<b>SUBPART F: IMPORT REQUIREMENTS</b>		
733.170	<b>Section 733.170 Imports</b> Have persons managing universal waste that is imported from a foreign country complied with the applicable requirements of Part 733 immediately after the waste enters the US? Yes _____ No _____ N/A _____	733.170

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	<b>PART 739: STANDARDS FOR THE MANAGEMENT OF USED OIL</b>	
	<b>SUBPART B: APPLICABILITY</b>	
	<b>Note:</b> Used oil not exceeding any specification level of Section 739.111 is subject only to Sections 739.172, 739.173 and 739.174(b).	
	<b>Section 739.112 Prohibitions</b>	
739.112(a)	a) Is used oil being managed only in a surface impoundment or waste pile that is regulated under Parts 724 or 725? Yes _____ No _____ N/A _____	739.112(a)
739.112(b)	b) Is used oil being used as a dust suppressant? Yes _____ No _____ N/A _____	739.112(b)
739.112(c)	c) Is off-spec oil fuel burned for energy recovery in only industrial furnaces identified in Section 720.111, utility boilers, or used oil fired space heaters that meet the provisions of Section 739.123? Yes _____ No _____ N/A _____	739.112(c)
	<b>SUBPART C: STANDARDS FOR USED OIL GENERATORS</b>	
	<b>Section 739.121 Hazardous Waste Mixing</b>	
739.121(a)	Is the generator mixing hazardous waste with used oil only as provided in Section 739.110(b)(2)(B) and (C)? Yes _____ No <u>X</u> N/A _____	739.121(a)
739.121(b)	If "Yes", is the generator of a used oil containing greater than 1000 ppm total halogens managing the used oil as a hazardous waste unless the presumption is rebutted (i.e. analytical data is available)? Yes _____ No _____ N/A _____	739.121(b)
	<b>Section 739.122 Used Oil Storage</b>	
739.122(a)	Does the generator only store used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes <u>X</u> No _____ N/A _____	739.122(a)
739.122(b)	Are containers and aboveground tanks used by a generator (to store used oil) in good condition with no visible leaks? Yes <u>X</u> No _____ N/A _____	739.122(b)
739.122(c)	Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"? <i>COULD NOT SEE GROUND CONTAINER IN A LOCKED AREA AT 335 STEWART</i> Yes _____ No _____ N/A _____	739.122(c)
739.122(d)	Has the generator, upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes <u>X</u> No _____ N/A _____	739.122(d)
	<b>Section 739.123 On-Site Burning in Space Heaters</b>	
739.123(a)	Is the generator burning used oil in used oil fired space heaters only when: 1) the heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourselfers (DIY) generators; and 2) the heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and 3) the combustion gases from the heater are vented to the ambient air? Yes _____ No _____ N/A <u>X</u>	739.123(a)
739.124	<b>Section 739.124 Off-Site Shipments</b> <i>BRENTM, CLEAN HARBORS, RINECO</i> Has the generator ensured that the used oil is hauled only by transporters that have obtained a USEPA ID # and an IEPA special waste ID # pursuant to Part 809, unless the generator qualifies for an exemption pursuant to Part 739 (self transportation to aggregate points owned by the generator or tolling agreements)? Yes _____ No _____ N/A _____	739.124

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	<b>SUBPART D: STANDARDS FOR USED OIL COLLECTION CENTERS</b>	
(b)	<b>Section 739.130 Do-It-Yourselfer (DIY) Used Oil Collection Centers</b> Does the DIY collection center comply with the generator standards in Subpart C of Part 739? Yes _____ No _____ N/A _____	739.130(b)
739.131(b)	<b>Section 739.131 Used Oil Collection Centers</b> Is the used oil collection center in compliance with the generator standards in Subpart C of Part 739 and registered by the Agency to manage used oil? Yes _____ No _____ N/A _____	739.131(b)
739.132(b)	<b>Section 739.132 Used Oil Aggregation Points Owned by the Generator</b> Does the owner/operator of a used oil aggregation point comply with all standards in Subpart C of Part 739? Yes _____ No _____ N/A _____	739.132(b)
739.141(a)	<b>SUBPART E: STANDARDS FOR USED OIL TRANSPORTER AND TRANSFER FACILITIES</b>	
	<b>Section 739.141 Restrictions on transporters who are not also processors</b> Has the used oil transporter who processes used oil complied with the requirements for processors in Subpart F [except as provided in subsection 739.141(b)]? Yes _____ No _____ N/A _____	739.141(a)
739.141(b)	<b>Note:</b> Used oil transporters may consolidate or aggregate loads of used oil for purposes of transportation. Has the transporter who conducts incidental processing operations that occur in the normal course of transportation (e.g. settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products, complied with the processor requirements in Subpart F? Yes _____ No _____ N/A _____	739.141(b)
739.142(a)	<b>Section 739.142 Notification</b> Has the used oil transporter complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.142(a)
739.143(a)	<b>Section 739.143 Used Oil Transportation</b> Has the used oil transporter delivered all used oil to: 1) another used oil transporter that has a USEPA ID # and an IEPA special waste ID #; or 2) a used oil processing facility that has a USEPA ID # and an IEPA special waste ID #; or 3) an off-spec used oil burning facility that has a USEPA ID # and an IEPA special waste ID #; or 4) an on-spec used oil burning facility? Yes _____ No _____ N/A _____	739.143(a)
739.143(b)	Has the used oil transporter complied with all applicable packaging and labeling, as well as applicable hazardous material regulations of the USDOT regulations of 49 CFR Parts 171 through 180?	739.143(b)
739.143(c)	Has the used oil transporter who has a discharge of used oil taken appropriate actions as outlined in Part 739? Yes _____ No _____ N/A _____	739.143(c)
739.144(a)	<b>Section 739.144 Rebuttable Presumption</b> Has the used oil transporter determined whether the total halogen content of the used oil transported or stored at a transfer facility is above or below 1000 ppm? Yes _____ No _____ N/A _____	739.144(a)
739.144(d)	Has the used oil transporter retained all records of analysis and information used to comply with this Section for at least 3 years? Yes _____ No _____ N/A _____	739.144(d)



Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.152(a)	<b>Section 739.152 - General Facility Standards</b> Has the owner/operator of a used oil processor and refiner: <ol style="list-style-type: none"> <li>1) maintained and operated the facility to minimize the possibility of fire, explosion, or release of used oil; and</li> <li>2) ensured that he is equipped with the equipment required in this Subsection; and</li> <li>3) tested and maintained equipment as required; and</li> <li>4) maintained access to communication or alarm system(s); and</li> <li>5) maintained the required aisle space; and</li> <li>6) maintained arrangements with local authorities?</li> </ol> <p style="text-align: right;">Yes _____ No _____ N/A _____</p>	739.152(a)
739.152(b)	Has the owner/operator of a used oil processing and refining facility complied with the following requirements: <ol style="list-style-type: none"> <li>1) developed a contingency plan; and</li> <li>2) ensured that the contingency plan complies with the requirements of this Section; and</li> <li>3) maintained and submitted to all local authorities copies of the contingency plan and all revisions; and</li> <li>4) amended the contingency plan as applicable to this Subsection; and</li> <li>5) ensured that an emergency coordinator is on the premises or on call at all times to meet the requirements of this Subsection; and</li> <li>6) ensured that emergency procedures meet the requirements of this Subsection?</li> </ol> <p style="text-align: right;">Yes _____ No _____ N/A _____</p>	739.152(b)
739.153	<b>Section 739.153 Rebuttable Presumption</b> Has the used oil processor determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? <p style="text-align: right;">Yes _____ No _____ N/A _____</p>	739.153
739.154(a)	<b>Section 739.154 Used Oil Management</b> Has the owner/operator of a used oil processor: <ol style="list-style-type: none"> <li>a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725?               <p style="text-align: right;">Yes _____ No _____ N/A _____</p> </li> </ol>	739.154(a)
739.154(b)	<ol style="list-style-type: none"> <li>b) stored used oil at a transfer facility only in containers and aboveground tanks that are in good condition with no visible leaks?               <p style="text-align: right;">Yes _____ No _____ N/A _____</p> </li> </ol>	739.154(b)
739.154(c)	<ol style="list-style-type: none"> <li>c) provided secondary containment for containers as required by this Subsection?               <p style="text-align: right;">Yes _____ No _____ N/A _____</p> </li> </ol>	739.154(c)
739.154(d)	<ol style="list-style-type: none"> <li>d) provided secondary containment for existing aboveground tanks as required by this Subsection?               <p style="text-align: right;">Yes _____ No _____ N/A _____</p> </li> </ol>	739.154(d)
739.154(e)	<ol style="list-style-type: none"> <li>e) provided secondary containment for new aboveground tanks as required by this Subsection?               <p style="text-align: right;">Yes _____ No _____ N/A _____</p> </li> </ol>	739.154(e)
739.154(f)	<ol style="list-style-type: none"> <li>f) labeled or marked containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"?               <p style="text-align: right;">Yes _____ No _____ N/A _____</p> </li> </ol>	739.154(f)
739.154(g)	<ol style="list-style-type: none"> <li>g) done the following upon detection of a release of used oil:               <ol style="list-style-type: none"> <li>1) stopped the release; and</li> <li>2) contained the release; and</li> <li>3) cleaned up and managed the used oil and other materials; and</li> <li>4) repaired or replaced the containers or tanks prior to returning them to service, if necessary?</li> </ol> <p style="text-align: right;">Yes _____ No _____ N/A _____</p> </li> </ol>	739.154(g)
739.154(h)	<ol style="list-style-type: none"> <li>h) closed aboveground tanks and containers in accordance with this Section?               <p style="text-align: right;">Yes _____ No _____ N/A _____</p> </li> </ol>	739.154(h)



Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.155	<b>Section 739.155 Analysis Plan</b> Has the owner/operator of a used oil processing and re-refining facility developed, kept on-site, and followed a written waste analysis plan describing the procedures that will be used to comply with the rebuttable presumption and on-spec Sections of this Part? Yes _____ No _____ N/A _____	739.155
739.156	<b>Section 739.156 Tracking</b> Has the used oil processor kept a record of each used oil shipment accepted for processing (i.e. invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the processor; and 2) the name and address of the generator or processor from whom the used oil was sent for processing; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the processor; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent for processing; and 5) the quantity of used oil shipped; and 6) the date of shipment? Yes _____ No _____ N/A _____	739.156
739.156(b)	Has the used oil processor kept a record of each shipment of used oil that is delivered to a burner, processor, or disposal facility that includes: 1) the name and address of the transporter who delivers the used oil to the burner, processor or disposal facility; and 2) the name and address of the burner, processor, or disposal facility who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivers the used oil to the burner, processor, or disposal facility; and 4) the IEPA special waste ID # of the burner, processor, or disposal facility who will receive the used oil; and 5) the quantity of used oil shipped; and 6) the date of shipment? Yes _____ No _____ N/A _____	739.156(b)
739.156(c)	Have the records described in this Section been maintained for at least 3 years? Yes _____ No _____ N/A _____	739.156(c)
739.157(a)	<b>Section 739.157 Operating Record and Reporting</b> Has the owner/operator kept a written operating record at the facility that contains the following: - records and results of oil analyses performed as described in the analysis plan required under Section 739.155? - summary reports and details of all incidents that require implementation of the contingency plan as specified in Section 739.152(b)? Yes _____ No _____ N/A _____	739.157(a)
739.157(b)	Has the used oil processor reported to the Agency in the form of a letter, on a biennial basis by March 1, the following information: 1) the IEPA special waste ID #, name and address of the processor; and 2) the calendar year covered by the report; and 3) the quantities of used oil accepted for processing and the manner in which the used oil is processed, including the specific processes employed; and 4) the USEPA ID #? Yes _____ No _____ N/A _____	739.157(b)
739.158	<b>Section 739.158 Off-Site Shipments of Used Oil</b> Has the used oil processor who initiates a shipment of used oil off-site used a used oil transporter that has a USEPA ID # and an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.158
739.159	<b>Section 739.159 Management of Residue</b> Does the used oil processor who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes _____ No _____ N/A _____	739.159

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.161	<b>SUBPART G: STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY</b> <b>Section 739.161 Restriction on Burning</b> Is off-spec oil fuel burned for energy recovery only in industrial furnaces identified in Section 720.111, utility boilers, used oil fired space heaters that meet the provisions of Section 739.123, or hazardous waste incinerators? Yes _____ No _____ N/A _____	739.161
739.162	<b>Section 739.162 Notification</b> Has the used oil burner complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.162
739.163(a)	<b>Section 739.163 Rebuttable Presumption for Used Oil</b> Has the used oil burner determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? Yes _____ No _____ N/A _____	739.163(a)
739.163(d)	Has the used oil burner retained all records of analyses and information used to comply with this Section for at least 3 years? Yes _____ No _____ N/A _____	739.163(d)
739.164(a)	<b>Section 739.164 Used Oil Storage</b> Has the owner/operator of a used oil burning facility: a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes _____ No _____ N/A _____	739.164(a)
739.164(b)	b) used only containers and aboveground tanks that are in good condition, with no visible leaks, to store used oil? Yes _____ No _____ N/A _____	739.164(b)
739.164(c)	c) provided secondary containment for containers as required by this Subsection? Yes _____ No _____ N/A _____	739.164(c)
739.164(d)	d) provided secondary containment for existing aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____	739.164(d)
739.164(e)	e) provided secondary containment for new aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____	739.164(e)
739.164(f)	f) labeled or marked all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes _____ No _____ N/A _____	739.164(f)
739.164(g)	g) upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes _____ No _____ N/A _____	739.164(g)
739.165(a)	<b>Section 739.165 Tracking</b> Has the used oil burner kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading or other) that includes: 1) the name and address of the transporter who delivered the used oil to the burner; and 2) the name and address of the generator or processor from whom the used oil was sent to the burner; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent to the burner; and 5) the quantity of used oil accepted; and 6) the date of acceptance? Yes _____ No _____ N/A _____	739.165(a)

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.165(b)	Have the records described in this Section been maintained on-site for at least 3 years? Yes _____ No _____ N/A _____	739.165(b)
739.166(a)	<b>Section 739.166 Notice</b> Prior to accepting the first shipment of off-spec used oil fuel, has the used oil burner provided to the GTP a one-time written and signed notice certifying that: 1) the burner has notified the Agency stating the location and general description of the used oil management activities; and 2) the burner will burn used oil only in an industrial furnace or boiler identified in Section 739.161(a)? Yes _____ No _____ N/A _____	739.166(a)
739.166(b)	Has the certification been maintained for at least 3 years from the date the burner last received a shipment of used oil from the GTP? Yes _____ No _____ N/A _____	739.166(b)
739.167	<b>Section 739.167 Management of Residue</b> Does the used oil burner who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes _____ No _____ N/A _____	739.167
739.171	<b>SUBPART H: STANDARDS FOR USED OIL FUEL MARKETERS</b>  <b>Section 739.171 Prohibitions</b> Has the used oil fuel marketer initiated a shipment of off-spec used oil only to a used oil burner that has a USEPA ID # and an IEPA special waste ID # and burns the used oil in an industrial furnace or boiler as specified in Section 739.161(a)? Yes _____ No _____ N/A _____	739.171
739.172(b)	<b>Section 739.172 On-Spec Used Oil Fuel</b> Has the GTP or burner who claims that the used oil meets the specification for used oil fuel under this Part, kept copies of analyses or other information for at least 3 years? Yes _____ No _____ N/A _____	739.172(b)
739.173(a)	<b>Section 739.173 Notification</b> Has the used oil marketer complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.173(a)
739.174(a)	<b>Section 739.174 Tracking</b> Has the used oil generator kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the burner; and 2) the name and address of the burner who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and 4) the IEPA special waste ID # of the burner; and 5) the quantity of used oil shipped; and 6) the date of acceptance? Yes _____ No _____ N/A _____	739.174(a)
739.174(b)	Has the GTP or burner who claims that the used oil meets the fuel specification under Section 739.111 kept a record of each shipment of used oil to an on-spec used oil burner that includes the following: 1) the name and address of the facility receiving the shipment; and 2) the quantity of used oil fuel delivered; and 3) the date of shipment or delivery; and 4) a cross-reference to the record of used oil analyses or other information used to make the determination that the oil meets the specifications as required under Section 739.172(a)? Yes _____ No _____ N/A _____	739.174(b)
739.174(c)	Have the records described in this Section been maintained on-site for at least 3 years? Yes _____ No _____ N/A _____	739.174(c)

Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
a)	<p><b>Section 739.175 Notices</b></p> <p>Before a used oil GTP directs the first shipment of off-spec used oil to a burner, has the generator obtained a one-time written and signed notice from the burner certifying that:</p> <ul style="list-style-type: none"> <li>1) the burner has notified the Agency stating the location and general description of used oil management activities; and</li> <li>2) the burner will burn the off-spec used oil only in an industrial furnace or boiler identified in Section 739.161(a)?</li> </ul> <p style="text-align: right;">Yes _____ No _____ N/A _____</p>	
	<p><b>COMMENTS:</b></p>	739.175(a)

TM:jab\739OIL.doc



Photo 1: Satellite Container at 434 Press



Photo 2: Satellite Container at 660 Press





Photo 3: Satellite Container by the 90 Day Storage Area



Photo 4: Used Bulb Storage



Photo 5: Satellite Container at Eagan Extrusion Laminator

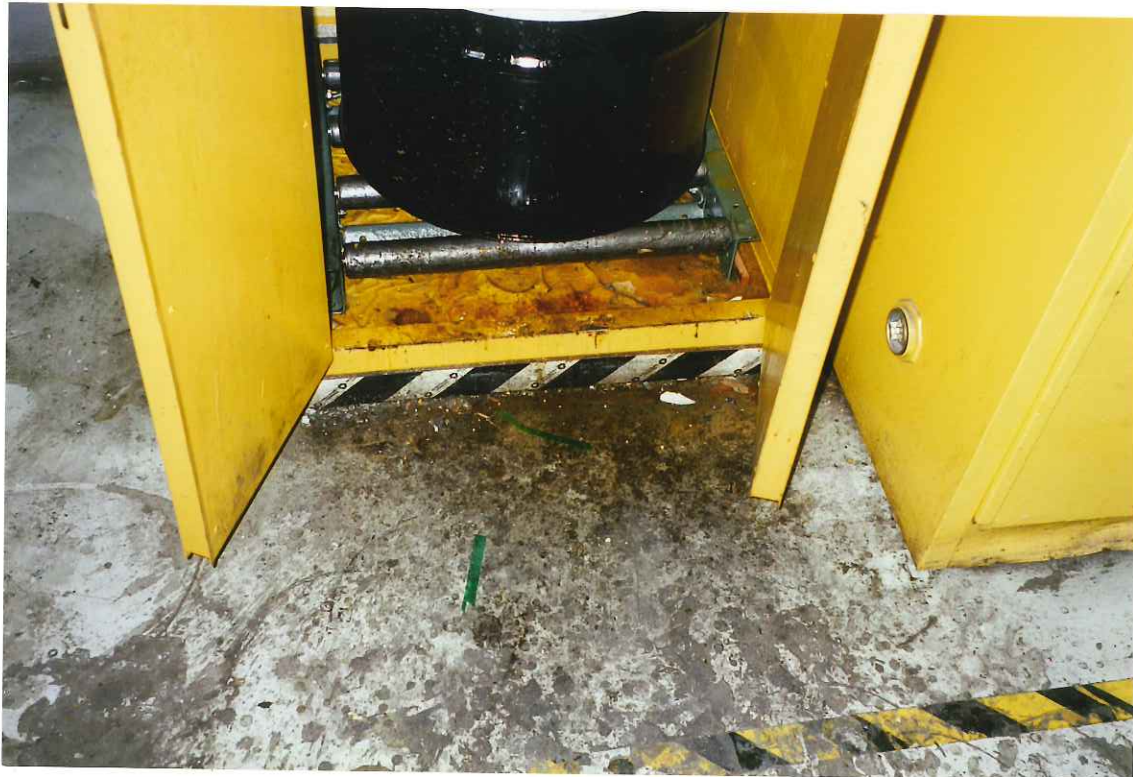


Photo 6: Spilled Hazardous Waste by Satellite Container at Eagan Extrusion Laminator





Photo 7: Possibly a Drum of Used Hydraulic Oil





Michael Valentino

12/29/03 02:59 PM

To: Jamie Paulin/R5/USEPA/US@EPA  
cc: Lorna Jereza/R5/USEPA/US@EPA  
Subject: Rollprint

Jamie:

I visited Rollprint on July 14, 2003 to familiarize myself with the facility and to determine if there were any changes since Howard's inspection on October 30, 2002. The following items are areas I concentrated on during my site visit in which I met with Mark Pederson, the facility's Environmental/Health & Safety Officer.

- Failure to inspect 90 day storage area (265.174): Howard found no evidence of weekly inspections for 10 weeks over a five-month span in 2002. I reviewed the container inspection logs from mid-October of last year to July 2003. Rollprint conducted inspections/maintained records for each week. Pederson claims the inspections were done in 2002, but he neglected to complete the inspection log sheets and insert them into the inspection folder. I believe we have an RTC here. We can include in an NOV, but this should be readily resolved.
- Failure to provide immediate access to internal alarm/emergency communication device (265.34): The 90 day storage area has no internal alarm system, telephone or air horn. HW was moved from the 2nd floor balcony to the first floor. An emergency fire exit is located in the rear of the room. Entrance is through a steel fire door, which automatically closes in case of fire. The room is equipped with sprinklers, and fire extinguishers are located near each door. The closest phone is located in an office approx 30 ft from the entrance to the storage area. I discussed with Pederson the need to install an air horn inside the room, near the fire door. This would ensure that, in the event of a fire which prevents escape through the fire door, a worker trapped inside would be able to sound for help and be rescued. Pederson committed to installing an air horn during my site visit. On July 15, 2003, Pederson called me. They offered to install a handle on the inside of the steel fire door, which would enable someone inside to open it. Also, the door will not activate until a fuse at the top of the door is tripped ---- thus, the fire would have to be approaching the door for it to activate. This would give a worker inside time to either escape through the fire door or to use the rear escape door. Pederson also agreed to install a wall mounted phone nearer to the fire door. I believe these changes will result in compliance on this issue, but follow-up is necessary.
- Contingency Plan does not include description of arrangements with police, fire, hospitals (265.52): Pederson explained that the city of Addison has an agreement (or ordinance) in place which requires the Fire Dept to provide fire and HazMat response. He will include some such language in the CP. I suspect this will be an issue which will require continued compliance assistance post-NOV. At least I encountered some willingness to participate.
- Opened SAA containers (262.34/265.173): I observed one SAA 55-gal drum w/ a funnel in the bung, and no lid on the funnel. Other drums were closed. Rollprint should be cited for these violations in the NOV. This is a matter of company diligence.
- SAA containers not marked (262.34): Rollprint houses their 55-gal drums in fireproof metal cabinets near each press. The cabinets are labeled "hazardous waste," but the containers are not. We discussed this further. Pederson claims he was waiting for EPA to get back to him after he and Howard discussed this. Pederson agreed to place HW labels on all SAA containers while they're in the metal cabinets. We should include in the NOV to ensure compliance is met, but I believe this issue will be resolved in the very near future.
- Failure to have waste analysis onsite (268.7): Pederson provided me with a waste analysis from Milsolv on its spent solvent waste stream.
- Failure to post names/phone # of emergency coordinator near phones at the 335 Stewart location (262.34): Pederson agreed to post these after we toured the facility and found them missing.
- Failure to post locations of fire extinguishers/spill equipment at 335 Stewart (262.34): Pederson agreed to post.

are to go  
of wood?

info of  
installation

14 led  
contingency  
plan

★

★

★  
in  
contingency  
plan

2  
2003


]

all

all

all

all

- 
- Personnel training (265.16): There are issues here that will require more work. Essentially, Rollprint lacks a formal training program and relies on initial and continuing on-the-job training/supervisory oversight. Description of training and evidence that employees involved in HW mgt activities are lacking. This could prove to be the most difficult issue to resolve and achieve RTC.

At the end of my site visit, I suggested to Pederson that Rollprint work on the compliance matters immediately. He indicated he would. Some of the violations require quick fixes that should have been implemented by now. Again, follow-up is needed.

I will walk the file over to you tomorrow morning. I am pretty free this week to discuss (but I am out Friday).

Mike

→ Brian Freeman →

3:00-  
3:15pm

Product Storage - 335 S. Stewart

CESQG-

↳ We have LQ6 in system

↳ Is there an issue?

↳ I think the contact made a mistake

- get annual haz waste reports
- get updated copy of contingency plan

---

40 CFR 262.12

↳ Problems - Tom Matheron }  
↳ Person-in-person. }

- Todd Karmaly-

Paul Ruesch → 86 Mary Intracoin  
↳ Paul Ruesch

tomorrow - next tuesday

↳ Home → 630-852-3154

---

Product Storage

335 S. Stewart

claimed CBSQ6

Our sys. states LQ6

Is there an issue?

Should we get copy of annual  
log waste report.

- Annual log waste report
- updated copy of contingency plan

- don't have to date  
satellite

Roto Counter = ok

Ultra Dam  $\rightarrow$  135 gal drum in cabinet  
container opened no label

GF6 / Dual Flex - satellite drum not labeled  
- open w/ funnel

FOUO/  
FOUO

$\rightarrow$  Unusual Waste - lamps

Bulk rules ??  $\rightarrow$  do they need to be  
labeled?

700-1728  $\rightarrow$  >1000 kg

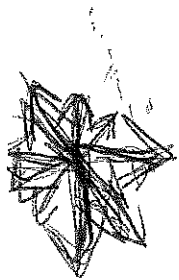
Training - can it be on the job?

July 14  $\rightarrow$  RTC?

- Should I call him 1st to check on issues?
- Should I just send 30073
- Do we need to determine to be a SNC again?
- Do I need to get a lawyer assigned?

$\rightarrow$  2 addresses?  $\rightarrow$  what is the deal  
w/ separation

$\rightarrow$  what is ILR  $\rightarrow$  #



→ Building?  
 Which facility were in?  
 what

300000  
 10

spill } } put stuff in spill?

data by  
 1000  
 points

Coaster  
 - Annual  
 - Net  
 Z

500



ng Stanton @ earthlink.net

$$\frac{V_1}{P_1} = \frac{V_2}{P_2}$$

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604

DATE: DEC 11 2002

FACILITY NAME: Rollprint Packaging Products,  
Incorporated

FACILITY ADDRESS: 320 South Stewart Avenue  
Addison, Illinois 60101  
ILD 984 766 642

335 South Stewart Avenue  
Addison, Illinois 60101  
ILR 000 049 429

FACILITY CONTACT: Mark E. Pederson, Environmental,  
Health & Safety Manager, (630) 628-  
1700, Ext. 3322, Fax: (630) 628-  
3505, email:  
mpederson@rollprint.com

FACILITY TYPE/  
PRIORITY SECTOR: Flexible Packaging Manufacturer

PBTs: None

REGULATORY REPRESENTATIVES: Howard Caine, U.S. EPA

DATE OF INSPECTION: October 30, 2002

SIC/NAIC CODE: 2671

REPORT PREPARED BY: Howard Caine, Env. Scientist *HC*

REPORT REVIEWED BY: Lorna M. Jereza, PE, Chief *LJ*

**Purpose of Inspection:** The purpose of the inspection was to conduct a Compliance Evaluation Inspection (CEI) at the facility for management of its RCRA regulated waste. The Illinois Environmental Protection Agency (Illinois EPA) was notified of this inspection, but did not participate. The company was given the Small Business Information sheet.

**Plant Description**

The facility is a manufacturer of flexible packaging. Rollprint



Packaging Products (Rollprint) also does printing and laminating and has an extrusion laminator. The company uses solvent adhesives, ethyl acetate and methyl ethyl ketone (MEK). The coatings are isopropyl alcohol (IPA) and toluene. The washup chemicals are ethyl acetate, MEK and toluene. The printing waste is IPA. Rollprint employs 150 people and operates Monday through Friday, 24 hours per day with three shifts.

### **On-site Observations**

I arrived on-site and I presented my credentials to Mr. Pederson and explained the purpose of the inspection. Mr. Pederson then described the facility operations and gave me a tour of the plant. Mr. Pederson told me that he used to work in RCRA Enforcement in Region 5. He added that the hazardous waste had been picked up at the facility prior to my arrival for inspection. Mr. Pederson said during the inspection that 345 and 335 South Stewart are all one building and 320 and 340 South Stewart are all one building. Product storage is done at 345 South Stewart.

### **Roto Coater**

The Roto Coater uses three water-based coatings. Clean-up is done with toluene.

### **UltraLam**

There was a 55 gallon drum in a cabinet. The container was open and had no label. There was a small amount of waste in the drum. Mr. Pederson said that this container had F003/F005 hazardous waste. The cabinet was labeled "Hazardous Waste".

### **GFG/Dual Flex**

There were two processes in this area. There were also no lights in this room. The GFG had a satellite drum that was not labeled and was open with a funnel in it and was inside a cabinet. There was liquid inside this drum. Mr. Pederson said that this container had F003/F005 hazardous waste. The cabinet was not labeled "Hazardous Waste".

The Dual Flex had a satellite drum that was not labeled and was open with a funnel in it and was inside a cabinet. There was liquid inside this drum. Mr. Pederson said that this container had F003/F005 hazardous waste. The cabinet was labeled "Hazardous Waste".



**434 Press**

This press primarily uses waste based inks, but does occasionally use a solvent based ink. This press had a satellite drum that was not labeled, but was closed and was inside a cabinet. Mr. Pederson said that this container had D001 hazardous waste methyl alcohol and isopropanol. The cabinet was labeled "Hazardous Waste".

**660 Press**

This press primarily uses solvent based inks. This press had a satellite drum that was not labeled and was open with a funnel. Liquid was full up to the top of this container. Mr. Pederson said that this container had D001 waste of isopropanol. The cabinet was labeled "Hazardous Waste". There were also containers of rags that are sent off for laundering. The containers were closed, but not labeled.

**90 Day Storage Area**

The hazardous waste was shipped off-site prior to my arrival stored in this room. The 90 day storage area is on the second floor of this room. The room had a fire extinguisher and a sprinkler system that is tested quarterly. The spill equipment is not located in this room. It is on the opposite of the shipping office which is located next to the 90 day storage area. The shipping office has a telephone. The operators do not carry radios when working in this area. The safety shower is downstairs from the 90 day storage area.

Downstairs of the 90 day storage area, there was an operator in this area, but he was not filling the hazardous waste drum while I was there. There was a 55 gallon drum that had a label, but it was not closed. It had a ½ lid on top of it. This container held F005 ethyl acetate and MEK. There was a small amount of this waste in the bottom of the drum. There was also 2, 5 gallon containers that were open, but they were still in use for cleaning purposes. I later returned to the room and found the 55 gallon drum with approximately 8.5" of hazardous waste based on my using my flashlight length as a reference. There was no one filling the drum at the time of my inspection.

**Used Bulb Storage-335 South Stewart**

This area was used for storing used bulbs. There were 6 boxes of 8' fluorescent light bulbs of which 2 were open and 1 was labeled. There were 15 boxes of U-tube bulbs of which 7 were

open and not labeled and 8 were labeled and closed. These bulbs were either labeled "Bad Fluorescent Bulbs" and "Bad Fluorescent Lamps". There were 3 boxes of 4' fluorescent bulbs. These boxes were closed and labeled.

#### **Eagan Extrusion Laminator-335 South Stewart**

Mr. Pederson said that 335 South Stewart is a conditionally exempt small quantity generator (CESQG). This laminator had a satellite drum that was not labeled and was open with a funnel. I looked inside the funnel and saw that there was solidified material inside the funnel. Soon after this, an operator poured waste into this drum from a 5 gallon container and it overflowed the funnel and spilled onto the floor. Mr. Pederson said that this container had F003 Acetate based clean-up waste. The operator added another 5 gallon container into this 55 gallon drum.

The maintenance area had what appeared to be a used oil drum. This drum was in a caged area and Mr. Pederson did not have the key to get into this area. Mr. Pederson said that it could be hydraulic oil. This drum was open with a funnel. There were also two product drums in this area that indicates it could be a lubricant. There was a phone and a fire extinguisher in the dock area. There was a sign by the phone that had 911 on it.

I then returned to where the hazardous waste was spilled onto the floor. The floor was still wet. There was a spill kit on the wall close to this drum.

According to manifest WIK268200, 385 gal of F005 (F003, D001, D035) hazardous waste toluene was shipped off-site from 335 South Stewart the morning of my inspection. According to the annual report, the density of Rollprint's hazardous waste is 7.38 lb/gal which equates to 1,290 kg of hazardous waste shipped off-site from 335 South Stewart on October 30, 2002. According to Handbook of Chemistry and Physics, 62<sup>nd</sup> Edition, the density of toluene is 0.8669 g/ml which equals 7.23 lb/gal. This equates to 1,264 kg of hazardous waste shipped off-site of the waste that was shipped from 335 South Stewart on October 30, 2002.

According to 35 IAC 721.105(g)(2), in order for hazardous waste generated by a conditionally exempt small quantity generator in quantities of less than 100 kilograms of hazardous waste during a calendar month to be excluded from full regulation under this Section, the generator must comply with the following requirements: the conditionally exempt small quantity generator may accumulate hazardous waste on-site. If it accumulates at any

time more than a total of 1,000 kilograms of the generator's hazardous waste, all of those accumulated waste are subject to regulation under the special provisions of 35 IAC 722 applicable to generators of between 100 kg and 1,000 kg of hazardous waste in a calendar month as well as the requirements of 35 IAC 702, 703, 705 and 723 through 726 and 728, and the applicable notification requirements of Section 3010 of the Resource Conservation and Recovery Act. The time period of 35 IAC 722.134(d) for accumulation of wastes on-site begins for a small quantity generator when the accumulated wastes exceed 1,000 kilograms.

#### Hazardous Waste Determination

Rollprint has made a hazardous waste determination using "knowledge of waste" on the hazardous waste it generates and handles this waste as hazardous waste. I asked Mr. Pederson for Rollprint's waste analysis records and he said that he didn't have any because he uses "knowledge of waste".

#### Manifest

Rollprint uses the Illinois Hazardous Waste Manifest to ship its hazardous waste in Illinois and also uses the manifest from the state to which the hazardous waste is designated. The manifests that were reviewed were filled in completely. Data from some of the manifests is recorded below:

Ship Date	Manifest	Waste Description	Designated Facility
2/28/02	WIK231840	1,650 gal F005 ethyl acetate, MEK	Brenntag WID 023 350 192
4/26/02	AR1290025	1,320 gal D001, D035, F003, F005 ethyl acetate, toluene	Rineco ARD 981 057 870
6/26/02	WIK286909	1,375 gal F005 toluene, n-propyl acetate	Brenntag WID 023 350 192
6/26/02	WIK286910*	275 gal F005 toluene	Brenntag WID 023 350 192
8/7/02	IL09965061	55 gal D039 perchloroethylene**	Safety-Kleen (Dolton) ILD 980 613 913
9/11/02	IL10390992	1,595 gal F003 MEK, toluene	Clean Harbors ILD 000 608 471
10/30/02	WIK268200*	385 gal F005 (F003, D001, D035) toluene	Brenntag WID 023 350 192
10/30/02***	WIK268198	1,320 gal F005 (F003, D001, D035) toluene, n-propyl acetate	Brenntag WID 023 350 192

\* Shipped off-site from 335 South Stewart Avenue

\*\* Mr. Pederson said that Rollprint does not have a parts washer. The D039 probably came from an ink spill or minor spill. This manifest was signed by Mark Thoms.

Mr. Pederson signed all the other forms.

\*\*\* Rollprint also shipped 16 gal of non-hazardous ink (water-based and 165 gal of hydraulic oil) on this date.

#### **Pre-Transport Requirements**

Rollprint did not have any hazardous waste ready for transport off-site as it was shipped off-site prior to my inspection.

#### **Use and Management of Containers**

Rollprint did not have any containers in its 90 day storage area

as the waste was shipped off prior to my arrival. I reviewed Rollprint's weekly inspection records. No inspections were performed during the weeks of 5/8/02, 5/20/02, 5/29/02, 6/12/02, 7/10/02, 7/24/02, 8/8/02, 8/22/02, 9/11/02, 9/19/02 and 10/2/02. Mr. Pederson stated that he performs the weekly inspections. I asked him who does the inspections in his absence when he is on vacation. He stated that he does not go on full week vacations.

### Preparedness and Prevention

Rollprint was not being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Rollprint has an internal communication or alarm system, a telephone to summon emergency assistance from local authorities. Rollprint tests and maintains its communication/alarm systems. Employees do not have immediate access to an internal alarm or an emergency communication device. There was no fire alarm pull and no communication device in the 90 day storage area. Mr. Pederson says that there is a sprinkler system and when there is a change in the water pressure the safety door would close where the hazardous waste is kept. Rollprint had adequate aisle space.

Rollprint has portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment or water at adequate volume and pressure for fire control.

Rollprint has made arrangements with the local emergency authorities, police, fire department, emergency response teams, or the local hospital with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosion or releases at the facility. Mr. Pederson said that the fire department is contracted by Rollprint.

### Contingency Plan

Rollprint has a Contingency Plan which is dated August 10, 1998. The plan describes the actions required for response to a fire, explosion and release. The plan does not describe the arrangements with the police department, fire department, hospital, contractors or emergency response teams. The plan says that arrangements have been made with these organizations. The plan contains the current emergency coordinator's name, phone number (home and office) and address. The plan lists the emergency equipment including the capability and location of the equipment. The plan included an evacuation plan, signal and

evacuation routes. The plan is maintained at the facility and have been submitted to the police, fire department, hospital and emergency response teams. The plan would be revised and reviewed when there is a change in regulations, plant operations, the emergency coordinator, emergency equipment, or if the Plan fails. The emergency coordinator is on-site or on-call at all times and is familiar with all facility activities, waste, records, layout and Contingency Plan. The emergency coordinator has the authority to commit the resources needed to carry out the actions as specified in the Contingency Plan.

### **Personnel Training**

Rollprint does not have a formal training program, but does provide on-the-job training (OJT) according to Mr. Pederson. Mr. Pederson said that the company doesn't like to stop the presses to have a formal training program. Mr. Pederson had a one page manual which discusses job functions and whose responsibility it is to carry out these duties. Mr. Pederson said that OJT is provided for new employees. The employees are observed and assessed throughout the year by their supervisors and Mr. Pederson. The supervisors also seek Mr. Pederson's input. Mr. Pederson said that about 20 employees go through OJT and includes pressmen, laminator operators and ink room assistants. Mr. Pederson gave the records for William Covert, Grade 3 Laminator Operator; Brian Durkin, Grade 3 Laminator Operator; Gilbert Martinez, Grade 3 Laminator Operator and Sigfredo Fatalino, Grade 2, Laminator. The duties for a Grade 3 Laminator Operator is "Responsibly managing hazardous waste at the point of generation" and "Properly transferring waste from point of generation to the less-than-90-day storage area". The duties of the Grade 2 Laminator Operator include those of a Grade 3 Laminator Operator in addition to "Serving as team leader, per contingency plan implementation". Mr. Pederson said that the position descriptions are included in another folder.

The Contingency Plan listed Mark Thoms, Joseph Miceli and Ken Zimmerman as the Emergency Coordinators. I asked to see their training records. Mr. Pederson stated that these employees do not receive hazardous waste training because their duties would be to assist in the evaluation of the emergency and call the fire department. He also stated that the President of the company does not want employees to respond to fires and that they are to get everyone out of the building. During my review of the manifests, I noted that Mark Thoms signed manifest IL09965061 on August 7, 2002. Mr. Thoms signed under the "Generator's Certification" of the manifest.

The Contingency Plan also listed Steve Mrowinski (Team Leader, 1<sup>st</sup> Shift), Steve Dreher (1<sup>st</sup> Shift), Mel Carrera (Team Leader, 2<sup>nd</sup> Shift) and John Martinez (Team Leader, 3<sup>rd</sup> Shift) as response team members. I asked to see their training records.

Mr. Pederson stated that these employees do not receive hazardous waste training because their duties would be to evacuate the employees and account for the employees. He also stated that these employees are department heads.

Mr. Pederson said that Rollprint maintains the training records until closure of the facility and those of former employees for at least 3 years from the last date of employment.

#### **Waste Analysis and Recordkeeping**

Rollprint does not treat any waste on-site.

#### **Satellite Accumulation**

Rollprint had satellite accumulation containers that were not labeled and were open. Rollprint had five drums that were opened and unlabeled; one drum that was opened, but labeled; and one drum that was closed, but unlabeled. At the time of the inspection, Rollprint had seven satellite generation points.

#### **Recordkeeping and Recording**

Rollprint has retained copies of its manifests and Annual Report. Rollprint did not have test results because Mr. Pederson says that the company uses "knowledge of waste".

#### **Annual Report**

Rollprint has submitted its Annual Report by March 1, 2002. According to the annual report, the owner and operator start date for this facility was 8/31/81. The annual report was signed on February 13, 2002. The NAICS was 322225 and 322221. The hazardous waste was listed as "waste solvent, adhesive, coating and inks from printing and laminating processes". There was 12,540 gal of hazardous waste shipped off-site and the density of the waste was 7.38 lb/gal. The hazardous waste was shipped to: Brenntag-WID 023 350 192 (7,920.0 gal), Rineco-ARD 981 057 870 (3,190.0 gal), Clean Harbors-ILD 000 608 471 (660.0 gal) and PCI-IND 000 646 943 (770.0 gal).

#### **Land Disposal Restrictions (LDRs)**

Rollprint's hazardous waste exceeds the treatment standards. An

LDR is sent with each shipment that I reviewed except for the waste associated with manifest IL09965061. I asked Mr. Pederson for the LDR form and he said that Safety-Kleen was provided the one-time notification. The LDR associated with manifest WIK231840 did not have non-wastewater/wastewater category filled in on this form.

Rollprint has made a hazardous waste determination using "knowledge of waste" on the hazardous waste it generates and handles this waste as hazardous waste. I asked Mr. Pederson for Rollprint's waste analysis records and he said that he didn't have any because he uses "knowledge of waste".

### Universal Waste

Rollprint is a small quantity handler of Universal Waste. The Universal Waste generated is lamps. There were 6 boxes of 8' fluorescent light bulbs of which 2 were open and 1 was labeled. There were 15 boxes of U-tube bulbs of which 7 were open and not labeled and 8 were labeled and closed. These bulbs were either labeled "Bad Fluorescent Bulbs" and "Bad Fluorescent Lamps". There were 3 boxes of 4' fluorescent bulbs. These boxes were closed and labeled. The previous shipment of used lamps was on May 9, 2002 and was shipped to Mercury Waste Solutions, Incorporated, 21211 Durand Avenue, Union Grove, Wisconsin 53182, (414) 878-2599, fax: (414) 878-2699. The shipment included 12 boxes of "U" tubes, 6 boxes of 4' fluorescent bulbs and 10 boxes of 8' fluorescent bulbs.

### Used Oil

The maintenance area had what appeared to be a used oil drum. This drum was in a caged area and Mr. Pederson did not have the key to get into this area. Mr. Pederson said that it could be hydraulic oil. This drum was open with a funnel. There were also two product drums in this area that indicates it could be a lubricant. I was unable to determine if the container was labeled "Used Oil". Mr. Pederson also said that it is hydraulic fluid, but no other oil. The haulers of the hydraulic fluid are Brenntag, Clean Harbors and Rineco.

### Comments

- 1) Rollprint was not inspecting its 90 day storage area on a weekly basis [35 IAC 725.274].
- 2) Rollprint was not being operated to minimize the possibility of a fire, explosion or any release of hazardous waste or



hazardous waste constituents which could threaten human health or the environment [35 IAC 725.131].

- 3) Rollprint did not provide all employees immediate access to an internal alarm or other emergency communication device when hazardous waste is being handled in the 90 day storage area [35 IAC 725.134].
- 4) Rollprint's Contingency Plan does not describe the arrangements with police and fire departments, hospitals, contractors and emergency response teams [35 IAC 725.152(c)].
- 5) Rollprint's Emergency Coordinators and Response Team Members do not receive annual training regarding hazardous waste management [35 IAC 725.116(c)].
- 6) Rollprint's Satellite containers were not closed [35 IAC 722.134(c)(1)(A)].
- 7) Rollprint's Satellite containers were not marked or labeled with the words "Hazardous Waste" [35 IAC 722.134(c)(1)(B)].
- 8) Rollprint's LDR for Manifest WIK231840 did not have the wastewater/nonwastewater category completed [35 IAC 728.107(a)(2)].
- 9) Rollprint did not have its waste analysis records on-site [35 IAC 728.107(a)(6)].
- 10) Rollprint had boxes of universal waste lamps that were not closed [35 IAC 733.113(d)(1)].
- 11) Rollprint had boxes of universal waste lamps that were not labeled "Universal Waste-lamp(s)", "Waste Lamp(s)" or "Used Lamps" [35 IAC 733.114(e)].
- 12) Rollprint did not have name and telephone number of the emergency coordinator posted next to the telephone at 335 South Stewart [35 IAC 722.134(d)(5)(B)(i)].
- 13) Rollprint did not have the location of the fire extinguishers and spill control equipment and, if present, fire alarms at 335 South Stewart [35 IAC 722.134(d)(5)(B)(ii)].





Photo 1: Satellite Container at 434 Press



Photo 2: Satellite Container at 660 Press



Photo 3: Satellite Container by the 90 Day Storage Area



Photo 4: Used Bulb Storage





Photo 5: Satellite Container at Eagan Extrusion Laminator



Photo 6: Spilled Hazardous Waste by Satellite Container at Eagan Extrusion Laminator



Photo 7: Possibly a Drum of Used Hydraulic Oil

bcc: Section Copy  
Author's Copy

**ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH**

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	
AUTHOR/ TYPIST	SECTION I CHIEF	ORC STAFF ATTORNEY	ORC SECTION CHIEF	ECAB BRANCH CHIEF	
<i>hhac</i> 12/14/02	<i>Limy</i> 12/14/02				

WPTD:ECAB:CS1:hhac:12/4/02

c:\epawork\rollprint\rollprint.rep.wpd

Attachments

Illinois EPA Inspection Report Form  
CESQG Inspection Checklist  
SQG Inspection Checklist  
LQG Inspection Checklist  
LDR Inspection Checklist  
Universal Waste Inspection Checklist  
Used Oil Inspection Checklist  
Manifest WIK231840  
LDR WIK231840  
Manifest IL09965061  
Rollprint Hazardous Waste Handling Procedure  
Rollprint Laminator Operator-Grade 2 Evaluation  
Rollprint Emergency Response and Contingency Plan



**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**  
**BUREAU OF LAND/FIELD OPERATIONS SECTION**  
**RCRA INSPECTION REPORT**

**GENERAL FACILITY INFORMATION**

USEPA ID #: <u>FLD 984 766 642</u>		IEPA ID #:
Facility Name: <u>ROLLRINT PARKING</u>		Phone #: <u>(830) 628-1700</u>
Location: <u>320 STOWART AVENUE, ADDISON, IL</u>		County: <u>DUPAGE</u>
City: <u>ADDISON</u>	State: <u>IL</u>	Zip Code: <u>60101</u>
Region: <u>DOB PLAINS</u>	Inspection Date: <u>10/30/02</u>	Time: <u>9<sup>30</sup>A</u>
Weather: <u>SUNNY, ~40'S</u>		

**TYPE OF FACILITY**

Notified As: <u>LCL</u>	Regulated As:
-------------------------	---------------

**TYPE OF INSPECTION**

<input checked="" type="checkbox"/> CEI:	<input type="checkbox"/> CME/O&M:	<input type="checkbox"/> CSI:	<input type="checkbox"/> NRR:	<input type="checkbox"/> CCI:	<input type="checkbox"/> PIF:	<input type="checkbox"/> CVI:	<input type="checkbox"/> CSE:	<input type="checkbox"/> CAO:
F/U to:		Other:						

**NOTIFICATION INFORMATION (EPA 8700-12)**

Notification Date:	(initial)	(subsequent)
--------------------	-----------	--------------

**PART A PERMIT INFORMATION (EPA 3510-3)**

Part A Date:	Amended:	Withdrawn:
--------------	----------	------------

**PART B PERMIT INFORMATION**

Part B Submitted:	Issued:	(check one)	Date:
-------------------	---------	-------------	-------

**ACTIVE ENFORCEMENT**

The company has been referred to USEPA:	IAGO:	County State's Attorney:
---	-------	--------------------------

**ACTIVE ENFORCEMENT ORDERS**

CACO:	CAFO:	Federal Court Order:
Consent Decree:	IPCB Order:	State Court Order:

**BRENNTAG GREAT LAKES, LLC**  
**LAND DISPOSAL RESTRICTION (LDR) AND NOTIFICATION FORM**

Generator Name Rollprint Packaging  
 Address 320 STEWART AVE  
ADDISON IL 60101

US EPA ID# ILD 984766642  
 Manifest # WIK 231890  
 Profile# (s) 011002B

**B. ☒ (Check if applicable)**

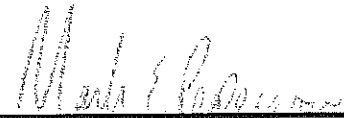
Restricted Waste contained in this shipment and referenced by the above Manifest number that are listed below are subject to the treatment standards set forth in 40 CFR 268.40. For each waste code, list the corresponding Subcategory, if applicable. Record an "X" in the appropriate column below for Treatability Group and each disclosure form attached.

(1) Profile Number	(2) USEPA Hazardous Waste Codes	(3) Subcategory (if applicable)	(4) Treatability Group		(5) F001-F005 Disclosure Form	(6) UTS Disclosure Form	
			NWW	WW	Attached	Attached	
011002B	TC05						
	RC03						
	100						
	1235						

**C.**

Profile Number	USEPA Hazardous Waste Code	Constituent	Concentration
		<input type="checkbox"/> Liquid wastes containing Nickel	134 mg/L
		<input type="checkbox"/> Liquid wastes containing Thallium	130 mg/L
		<input type="checkbox"/> Wastes containing HOC's*	1000 mg/kg
		(*) HOC's as defined in 40 CFR 268 Appendix III	

**D. Notification Statement:** This waste must be treated to the applicable treatment standards set forth in 40 CFR 268 Subpart D, Section 268.32, or RCRA Section 3004 (d). Waste analysis is attached where available, otherwise the information herein is based upon my thorough knowledge of the waste(s). I hereby certify that the information provided is complete and accurate based on my knowledge of the material.

\*   
 Generator Signature

2.28.02  
 Date

\* EMS Manager  
 Title

**Generator Copy**

# E. Treatment Standards for F001 - F005 Spent Solvents Disclosure Form

Underlying constituents for F001 - F005. The waste material reference in page 1 section B meets the treatment standards for the hazardous constituents marked below.

Profile Number: \_\_\_\_\_

Hazardous Waste No.	Constituents of concern	Nonwastewater		Wastewater Total composition mg/L
		Total composition mg/kg	TCLP mg/L	
F001-	<input type="checkbox"/> Carbon tetrachloride	5.6	-	0.06
	<input type="checkbox"/> Methylene chloride	33	-	0.09
	<input type="checkbox"/> Tetrachloroethylene	5.6	-	0.06
	<input type="checkbox"/> 1,1,1-Trichloroethane	5.6	-	0.05
	<input type="checkbox"/> Trichloroethylene	5.6	-	0.05
	<input type="checkbox"/> 1,1,2-Trichloro-1,2,2-trifluoroethane	28	-	0.06
	<input type="checkbox"/> Trichloromonofluoromethane	33	-	0.02
F002-	<input type="checkbox"/> Chlorobenzene	5.7	-	0.06
	<input type="checkbox"/> o-Dichlorobenzene	6.2	-	0.09
	<input type="checkbox"/> Methylene chloride	33	-	0.09
	<input type="checkbox"/> Methylene chloride (Pharmaceutical Industry-Wastewater Subcategory)	-	-	0.44
	<input type="checkbox"/> Tetrachloroethylene	5.6	-	0.06
	<input type="checkbox"/> 1,1,1-Trichloroethane	5.6	-	0.05
	<input type="checkbox"/> 1,1,2-Trichloroethane	7.6	-	0.03
	<input type="checkbox"/> Trichloroethylene	5.6	-	0.05
	<input type="checkbox"/> 1,1,2-Trichloro-1,2,2-trifluoroethane	28	-	0.06
	<input type="checkbox"/> Trichloromonofluoromethane	33	-	0.02
F003-	<input type="checkbox"/> Acetone	160	-	0.28
	<input type="checkbox"/> n-Butyl alcohol	2.6	-	5.6
	<input type="checkbox"/> Cyclohexanone*		0.75	0.36*
	<input checked="" type="checkbox"/> Ethyl acetate	33	-	0.34
	<input type="checkbox"/> Ethyl benzene	6	-	0.06
	<input type="checkbox"/> Ethyl ether	160	-	0.12
	<input type="checkbox"/> Methanol*		0.75	5.6*
	<input type="checkbox"/> Methyl isobutyl ketone	33	-	0.14
	<input type="checkbox"/> Xylenes (total)	28	-	0.32
F004-	<input type="checkbox"/> Cresol (m-and p- isomers)	3.2	-	0.77
	<input type="checkbox"/> o-Cresol	5.6	-	0.11
	<input type="checkbox"/> Nitrobenzene	14	-	0.07
F005-	<input type="checkbox"/> Benzene	3.7	-	0.07
	<input type="checkbox"/> Carbon disulfide*		4.8	.014*
	<input type="checkbox"/> 2-Ethoxyethanol	INCIN	-	BIODG; or INCIN
	<input type="checkbox"/> Isobutyl alcohol	170	-	5.6
	<input type="checkbox"/> Methyl ethyl ketone	36	-	0.28
	<input type="checkbox"/> 2-Nitropropane	INCIN	-	(WETOX or CHOXD)
	<input type="checkbox"/> Pyridine	16	-	0.01
	<input type="checkbox"/> Toluene	28	-	0.08

Note: F005 spent solvent wastes containing 2-Nitropropane and/or 2-Ethoxyethanol have treatment standards outlined in 40 CFR 268.40 and must be referenced in Table B page 2. (\*) The treatment standards for Carbon Disulfide, Cyclohexanone, and Methanol nonwastewaters are based on the TCLP and apply only to spent solvents containing one, two, or all three of these constituents. If a waste contains any of these three constituents along with any other constituents found in F001-F005, then only the treatment standards for the other constituents apply (i.e., the standard for Carbon Disulfide, Cyclohexanone, and Methanol do not apply when other constituents are present).

# F. Universal treatment standards Disclosure Form

Underlying constituents for D001\*\* (low TOC, non-CWA), D002 (non-CWA), D012-D017 (nonwastewater), D018-D043

(non-CWA), and F039. The waste material in Section B exceeds the treatment standards for the hazardous constituents marked below.

☐ Check if none of the underlying hazardous constituents apply

Constituents	NWW	WW	Constituents	NWW	WW	Constituents	NWW	WW
Acenaphthylene	3.4	0.059	Dichlorodifluoromethane	7.2	0.23	5-Nitro-o-toluidine	28	0.32
Acenaphthene	3.4	0.059	1,1-Dichloroethane	6	0.059	o-Nitrophenol	13	0.028
Acetone	160	0.28	1,2-Dichloroethane	6	0.21	p-Nitrophenol	29	0.12
Acetonitrile	1.8	5.6	1,1-Dichloroethylene	6	0.025	N-Nitrosodiethylamine	28	0.4
Acetophenone	9.7	0.01	trans-1,2-Dichloroethylene	30	0.054	N-Nitrosodimethylamine	2.3	0.4
2-Acetylaminofluorene	140	0.059	2,4-Dichlorophenol	14	0.044	N-Nitroso-di-n-butylamine	17	0.4
Acrolein	NA	0.29	2,6-Dichlorophenol	14	0.044	N-Nitrosomethylethylamine	2.3	0.4
Acrylamide	23	19	1,2-Dichloropropane	18	0.85	N-Nitrosomorpholine	2.3	0.4
Acrylonitrile	84	0.24	cis-1,3-Dichloropropylene	18	0.036	N-Nitrosopiperidine	35	0.013
Aldrin	0.066	0.021	trans-1,3-Dichloropropylene	18	0.036	N-Nitrosopyrrolidine	35	0.013
4-Aminobiphenyl	NA	0.13	Dieldrin	0.13	0.017	Parathion	4.6	0.014
Aniline	14	0.81	Diethyl phthalate	28	0.2	Total PCB's (all Aroclors)	10	0.1
Anthracene	3.4	0.059	2,4-Dimethyl phenol	14	0.036	Pentachlorobenzene	10	0.055
Aramite	NA	0.36	Dimethyl phthalate	28	0.047	PeCDDs (All PeCDDs)	0.001	0.000063
alpha-BHC	0.066	0.0001	Di-n-butyl phthalate	28	0.057	PeCDFs (All PeCDFs)	0.001	0.000035
beta-BHC	0.066	0.0001	1,4-Dinitrobenzene	2.3	0.32	Pentachloroethane	6	0.055
delta-BHC	0.066	0.023	4,6-Dinitro-o-cresol	160	0.28	Pentachloronitrobenzene	4.8	0.055
gamma-BHC	0.066	0.0017	2,4-Dinitrophenol	160	0.12	Pentachlorophenol	7.4	0.089
Benzene	10	0.14	2,4-Dinitrotoluene	140	0.32	Phenacetin	16	0.081
Benz(a)anthracene	3.4	0.059	2,6-Dinitrotoluene	28	0.55	Phenanthrene	5.6	0.059
Benzal chloride	6	0.055	Di-n-octyl phthalate	28	0.017	Phenol	6.2	0.039
Benzo(b)fluoranthene	6.8	0.11	p-Dimethylaminoazobenzene	NA	0.13	Phorate	4.6	0.021
Benzo(k)fluoranthene	6.8	0.11	Di-n-propylnitrosamine	14	0.4	Phthalic acid	28	0.055
Benzo(g,h,i)perylene	1.8	0.0055	1,4-Dioxane	170	NA	Phthalic anhydride	28	0.055
Benzo(a)pyrene	3.4	0.061	Diphenylamine	13	0.92	Pronamide	1.5	0.093
Bromodichloromethane	15	0.35	Diphenylnitrosamine	13	0.92	Pyrene	8.2	0.067
Methyl bromide	15	0.11	1,2-Diphenylhydrazine	NA	0.087	Pyridine	1.6	0.014
(Bromomethane)			Disulfoton	6.2	0.017	Safrole	22	0.081
4-Bromophenyl phenyl etl	15	0.055	Endosulfan I	0.066	0.023	Silvex (2,4,5-TP)	7.9	0.72
n-Butyl alcohol	2.6	5.6	Endosulfan II	0.13	0.029	2,4,5-T (2,4,5-Trichloro-phenoxycetic acid)	7.9	0.72
Butyl benzyl phthalate	28	0.017	Endosulfan sulfate	0.13	0.029	1,2,4,5-Tetrachlorobenzene	14	0.055
2-sec-Butyl-4,6-dinitrophenol	2.5	0.066	Endrin	0.13	0.0028	TCDDs (All TCDDs)	0.001	0.000063
(Dinoseb)			Endrin aldehyde	0.13	0.025	TCDFs (All TCDFs)	0.001	0.000063
Carbon disulfide	0mg/ATCLP	3.8	Ethyl acetate	33	0.34	1,1,1,2-Tetrachloroethane	6	0.057
Carbon tetrachloride	6	0.057	Ethyl cyanide (Propanenitrile)	360	0.24	1,1,2,2-Tetrachloroethane	6	0.057
Chlordane (alpha and gamma isomers)	0.26	0.0033	Ethyl benzene	10	0.057	Tetrachloroethylene	6	0.056
p-Chloroaniline	16	0.46	Ethyl ether	160	0.12	2,3,4,6-Tetrachlorophenol	7.4	0.03
Chlorobenzene	6	0.057	bis(2-Ethylhexyl) phthalate	28	0.28	Toluene	10	0.08
Chlorobenzilate	NA	0.1	Ethyl methacrylate	160	0.14	Toxaphene	2.6	0.0095
2-Chloro-1,3-butadiene	0.28	0.057	Ethylene oxide	NA	0.12	Bromoform (Tribromomethane)	15	0.63
Chlorodibromomethane	15	0.057	Famphur	15	0.017	1,2,4-Trichlorobenzene	19	0.055
Chloroethane	6	0.27	Fluranthene	3.4	0.068	1,1,1-Trichloroethane	6	0.054
bis(2-Chloroethoxy)metha	7.2	0.036	Fluorene	3.4	0.059	1,1,2-Trichloroethane	6	0.054
bis(2-Chloroethyl)ether	6	0.033	Heptachlor	0.066	0.0012	Trichloroethylene	6	0.054
Chloroform	6	0.046	Heptachlor epoxide	0.066	0.016	Trichloromonofluoromethane	30	0.02
bis(2-Chloroisopropyl)eth	7.2	0.055	Hexachlorobenzene	10	0.055	2,4,5-Trichlorophenol	7.4	0.18
p-Chloro-m-cresol	14	0.018	Hexachlorobutadiene	5.6	0.055	2,4,6-Trichlorophenol	7.4	0.036
2-Chloroethyl vinyl ether	NA	0.062	Hexachlorocyclopentadiene	2.4	0.057	1,2,3-Trichloropropane	30	0.05
Chloromethane	30	0.19	HxCDDs (All HxCDDs)	0.001	6.3E-05	1,1,2-Trichloro-1,2,2-trifluoro-ethane)	30	0.057
(Methyl chloride)			HxCDFs (All HxCDFs)	0.001	6.3E-05	tris-(2,3-Dibromopropyl-phosphate)	0.1	0.11
2-Chloronaphthalene	5.6	0.055	Hexachloroethane	30	0.055	Vinyl chloride	6	0.27
2-Chlorophenol	5.7	0.044	Hexachloropropylene	30	0.035	Xylenes-All mixed isomers	30	0.32
3-Chloropropylene	30	0.036	Indeno (1,2,3-c,d) pyrene	3.4	0.0055	Antimony	2.1mg/ITCLP	1.9
Chrysene	3.4	0.059	Iodomethane	65	0.19	Arsenic	5.0mg/ITCLP	1.4
o-Cresol	5.6	0.11	Isobutyl alcohol	170	5.6	Barium	7.6mg/ITCLP	1.2
m-Cresol	5.6	0.77	Isodrin	0.066	0.21	Beryllium	0.014mg/ITCLP	0.82
p-Cresol	5.6	0.77	Isosafrole	2.6	0.081	Cadmium	0.19mg/ITCLP	0.69
Cyclohexanone	5mg/ITCLP	0.36	Kepone	0.13	0.0011	Chromium (Total)	0.86mg/ITCLP	2.77
1,2-Dibromo-3-chloroprop	15	0.11	Methacrylonitrile	84	0.24	Cyanides (Total)*	590	1.2
Ethylene dibromide	15	0.028	Methanol	75mg/ITCLP	5.6	Cyanides (Amenable)*	30	0.86
(1,2-Dibromoethane)			Methapyrilene	1.5	0.081	Fluoride	NA	35
Dibromomethane	15	0.11	Methoxychlor	0.18	0.25	Lead	0.37mg/ITCLP	0.69
2,4-D (2,4-Dichlorophenoacetic acid)	10	0.72	3-Methylcholanthrene	15	0.0055	Mercury-Nonwastewater from Retort	0.20mg/ITCLP	NA
o,p'-DDD	0.087	0.023	4,4-Methylene bis (2-chloroaniline)	38	0.089	Mercury-All others	0.025mg/ITCLP	0.15
p,p'-DDD	0.087	0.023	Methylene chloride	38	0.28	Nickel	5.0mg/ITCLP	3.98
o,p'-DDE	0.087	0.031	Methyl ethyl ketone	36	0.14	Selenium	0.16mg/ITCLP	0.82
p,p'-DDE	0.087	0.031	Methyl isobutyl ketone	33	0.14	Silver	0.30mg/ITCLP	0.43
o,p'-DDT	0.087	0.0039	Methyl methacrylate	160	0.18	Sulfide	NA	14
p,p'-DDT	0.087	0.0039	Methyl methanesulfonate	NA	0.018	Thallium	0.70mg/ITCLP	1.4
Dibenzo(a,h)anthracene	8.2	0.055	Methyl parathion	4.6	0.014	Vanadium	0.23mg/ITCLP	4.3
Dibenzo(a,e)pyrene	NA	0.061	Naphthalene	5.6	0.059	Zinc	5.3mg/ITCLP	2.61
m-Dichlorobenzene	6	0.36	2-Naphthylamine	NA	0.52			
o-Dichlorobenzene	6	0.088	o-Nitroaniline	14	0.27			
p-Dichlorobenzene	6	0.09	p-Nitroaniline	28	0.028			
			Nitrobenzene	14	0.068			

(\*) Both Cyanides (Total) and Cyanides (Amenable) for nonwastewaters are to be analyzed using SW-846 Method or 9010 or 9012 with

sample size of 10 grams and a distillation time of one hour and 15 minutes.

selection of D001 constituents is only required for low TOC ignitable liquids managed in nonCWA facilities.



PLEASE TYPE

5-034-01

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (Rev. 6-89)

Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD984766642		Manifest Document No. 187601		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is required by Illinois law.					
3. Generator's Name and Mailing Address ROLLPRINT PACKAGING 120 STEWART ADDISON IL 60101						A. Illinois Manifest Document Number IL09965061							
4. 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS 630 628-1700						B. Generator's IL ID Number 10430055061							
5. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.						C. Transporter's ID Number UPW151288IL							
7. Transporter 2 Company Name						D. Transporter's Phone 847 468-6600							
9. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 633 E 138TH ST DOLTON, IL 60419						E. Transporter's ID Number							
10. US EPA ID Number ILD980613913						F. Transporter's Phone ( )							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. RO HAZARDOUS WASTE, SOLID, N.O.S. (PERCHLOROETHYLENE) 9 NA3077 PG III (D039)(ERG#171)						001 DM		000.55 G				EPA HW Number D039	
b.												EPA HW Number	
c.												EPA HW Number	
d.												EPA HW Number	
J. Additional Description for Materials Listed Above						K. Handling Codes for Wastes Listed Above In Item #14 H041							
15. Special Handling Instructions and Additional Information EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY. SKDOT# A: 1604 B: C: D:						MFST R/T#102463276 0000-7889-37							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						Date Month Day Year 08 07 02							
Printed/Typed Name Mark Thoms						Signature Mark Thoms						Date Month Day Year 08 07 02	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name M. WEICHERT						Signature M. Weichert						Date Month Day Year 08 07 02	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature						Date Month Day Year	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name Sara Mills						Signature Sara Mills						Date Month Day Year 08 13 02	

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

A) 3600189/410058

In case of a spill call the Illinois Office of Emergency Response at 217/782-7860 and the National Response Center at 800/424-8802 or 202/426-2675.



Purpose: To insure hazardous wastes are removed in a timely and safe manner.

Application: All solvents and water based wastes.

Training Requirements: V.P. of Manufacturing, Manufacturing Manager, Environmental Health and Safety Manager, Printing Press Operator, Laminator Operator, Printing Press Helper, Laminator Helper, Color Matcher, Ink Room Assistant, Shift Supervisor, Operations Manager, Mounter/Plate Maker (Bloomfield)

Procedure:

**ADDISON**

1. The Equipment operators are responsible for separating hazardous wastes into the following categories:
  - Solvent Wastes.
  - Water-Based Inks.
  - Water-Based Latex Coatings.
2. Solvents wastes will be accumulated in steel drums located in the flammable liquids storage cabinets behind the equipment.
3. Water-based inks are accumulated in steel drums located in the ink room.
4. Water-based latex coatings are accumulated in fiber drums located near the Roto.
5. Operators will bring the sealed steel drums to the Ink Room when they are full.
6. Ink Room personnel will label and store the steel drums for disposal in the designated less than 90-day Hazardous Waste storage area.
7. The water-based latex coatings will be sent to the dock area for disposal by Ink Room personnel.
8. When the appropriate number of drums has accumulated, the Environmental, Health & Safety Manager will be notified. If the EHS Manager is unavailable, notify the V.P. of Manufacturing.
9. A hazardous waste pick-up will be scheduled with a qualified vendor.

**BLOOMFIELD**

1. The equipment operators are responsible for transferring hazardous waste generated at the machine to the 330-gallon totes located in the less-than-90 day storage area
2. The waste will be stored in the four (4) 330-gallon totes prior to off-site transfer.
3. Operators will transfer the wastes generated at the machine in 5-gallon pails to the Hazardous Waste storage area and place the waste in the appropriate tote.
4. The totes are to be marked with the words "Hazardous Waste." The date at which the tote first receives hazardous waste, that date will be place on the tote, identifying the start of the accumulation period.
5. When the last tote becomes half full, or the 90-day storage limit is approaching, the Manufacturing Manager will be notified.
6. A hazardous waste pick-up will be scheduled with a qualified vendor.

# **LAMINATOR OPERATOR - GRADE 2 EVALUATION**

**JOB TITLE:** LAMINATOR OPERATOR - GRADE 2

**DEPARTMENT:** PLANT

**REPORTS TO:** SHIFT SUPERVISOR

**SUPERVISES:** NOT APPLICABLE

**EVALUATION ONLY**

**POSITION OBJECTIVE:** Operate the laminators in order to manufacture products in accordance with customer specifications, quality standards, and performance standards.

**EXCEEDS  
EXPECTATIONS**

**MEETS  
EXPECTATIONS**

**UNACCEPTABLE**

## **Critical Job Functions**

*Attendance:*

ABSENCES	TARDIES	COMBINED TOTAL
2	1	2.25

1. Implement safe working conditions by:

- A. Learning the hazards associated with your assigned duties.
- B. Following all safety procedures.
- C. Using the proper personal protective equipment.
- D. Reporting any unsafe conditions.
- E. Following good housekeeping practices.
- F. Responsibly managing hazardous waste at the point of generation.
- G. Properly transferring waste from point of generation to the less-than-90-day storage area.
- H. Serving as team leader, per Contingency Plan implementation.

<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

2. Ensure the delivery of quality products by:

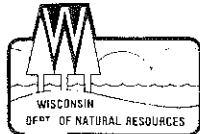
- A. Operating laminating equipment as necessary.
- B. Getting first piece approval and line clearance prior to production.
- C. Monitoring quality and making corrections when necessary.
- D. Submitting the required samples to Quality Assurance.
- E. Adhering to Rollprint Quality System procedures.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Perform in a productive efficient manner by:

- A. Setting-up, running, and washing laminators in accordance with specified standards.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	-------------------------------------	--------------------------



## STATE OF WISCONSIN

Chapter 291, Wis. Stats.

Form 4400-66P

Rev. 1-99

ALL COPIES MUST BE LEGIBLE,  
PLEASE TYPE

State of Wisconsin  
Department of Natural Resources  
Bureau of Waste Management  
Box 8094  
Madison, WI 53708

FOR DNR USE ONLY

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address		Site Location If Different		A. State Manifest Document Number WI K231840		
4. Generator's Phone ( )				B. State Generator's ID		
5. Transporter 1 Company Name		6. US EPA ID Number		C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone		
9. Designated Facility Name and Site Address		10. US EPA ID Number		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. METHYL ETHYL KETONE 3 UNDR 11		430	4	1650	9	1000
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;						
OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name & Position Title		Signature		Date		
MARC JOHNSON EHS Manager		[Signature]		Month Day Year		
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name & Position Title		Signature		Month Day Year		
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials				Date		
Printed/Typed Name & Position Title		Signature		Month Day Year		
[Signature]		[Signature]		03/10/2002		
19. Discrepancy Indication Space						
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
d/Typed Name & Position Title		Signature		Date		
[Signature]		[Signature]		Month Day Year		

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Copy Distribution:

1 - Generator send to Wis. DNR

2 - Generator retain

3 - Facility send to Wis. DNR

4 - Facility retain

5 - Facility send to Generator

6 - Transporter retain

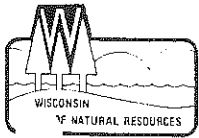
Emergency 24 Hour Assistance  
and Spill Reporting

COPY 5 -

Copies 1 &amp; 3 mail to Wis. DNR at above address.

Telephone Number: (800) 943-0003 FACILITY SEND TO GENERATOR





## STATE OF WISCONSIN

Chapter 291, Wis. Stats.

Form 4400-66P

Rev. 1-99

ALL COPIES MUST BE LEGIBLE,  
PLEASE TYPE

State of Wisconsin  
Department of Natural Resources  
Bureau of Waste Management  
Box 8094  
Madison, WI 53708

FOR DNR USE ONLY

Printed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. ILD 984766642		Manifest Document No. 10000		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address ROLL-IT PACKAGING 320 STEWART AVE ADDISON IL 60101				Site Location If Different IL 60101				A. State Manifest Document Number WI K231840	
4. Generator's Phone (630) 628-1700								B. State Generator's ID	
5. Transporter 1 Company Name SET ENVIRONMENTAL				6. US EPA ID Number ILD 981997236				C. State Transporter's ID 11957	
7. Transporter 2 Company Name				8. US EPA ID Number				D. Transporter's Phone 800-742-7040	
9. Designated Facility Name and Site Address BRENNING GREAT LAKES LLC N59 W14776 BOBOLINK AVE. MENOMONEE FALLS, WI 53051				10. US EPA ID Number WID 023350192				E. State Transporter's ID	
								F. Transporter's Phone	
								G. State Facility's ID	
								H. Facility's Phone (262)-252-3550	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity	
a. RC WASTE FLAMMABLE LIQUIDS, N.O.S. (METHYL ETHYL KETONE) 3 UN1993 PG II						130 M		11/650	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information ATEX 128 EMER RESP PH # (630) 628-1700									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;  OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name & Position Title MARK PEDERSON EHS MANAGER						Signature Mark Pederson		Date 02/28/2000	
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials						Signature [Signature]		Date 02/28/2000	
Printed/Typed Name & Position Title [Name]						Signature [Signature]		Date 02/28/2000	
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials						Signature [Signature]		Date [Date]	
Printed/Typed Name & Position Title						Signature		Date [Date]	
19. Discrepancy Indication Space									
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name & Position Title						Signature		Date [Date]	

